New Solvent-Contaminated Wipe Guidance for Kansas

The Kansas Department of Health and Environment (KDHE) recently issued a Technical Guidance Document which describes a new option for how solvent-contaminated wipes can be managed in Kansas.

Under the new rule, reusable and disposal wipes are excluded from regulation under RCRA Subtitle C if certain handling, disposal, recordkeeping and container management conditions are met.

Solvent wipes are any wipe contaminated with one or more solvents on the F001 through F005 list or the corresponding P or U listed solvents, or that only exhibit the characteristic of ignitability when contaminated with one or more of the non-listed solvents.

Wipes ***not*** eligible for the exclusion are:

* Wipes that contain a listed hazardous waste other than solvents;
* Wipes that exhibit the characteristic of toxicity, corrosivity, or reactivity due to non-listed solvents or contaminants other than solvents; and,
* Disposable wipes that are hazardous waste due to the presence of trichloroethylene.

Reusable wipes must go to a laundry or dry cleaner whose discharge is regulated by the Clean Water Act. Disposable wipes must go to a special municipal solid waste landfill or a special municipal waste combustor.

For a list of approved landfills which can accept disposable wipes, or for more information, read the Technical Guidance Document here.

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**Mason Appointed to EPA Policy and Technology Council**

Acting EPA Administrator Andrew Wheeler has appointed iSi CEO Gary Mason to EPA’s National Advisory Council for Environmental Policy and Technology, or NACEPT.

“This is an amazing opportunity to participate on developing environmental policy for our nation. I’m extremely excited and look forward to working with other members of the council,” said Mason.

NACEPT brings together representatives from the government, business and industry, environmental organizations, academia, and other groups to advise the EPA Administrator on issues relating to federal environmental statutes, executive orders, regulations, programs and policies.

As part of the Council, Mason will be providing advice and recommendations on:

* Developing and implementing domestic and international management policies and programs;
* Developing guidance on how EPA can most efficiently and effectively implement innovative approaches throughout the Agency and its programs;
* Identifying approaches to enhance information and technology planning;
* Improving approaches to environmental management in the fields of economics, business operations, and emerging technologies;
* Increasing communication and understanding with the goal of improving the effectiveness of federal and non-federal resources directed at solving environmental problems; and,
* Evaluating statutes, executive orders, and regulations and reviewing and assessing their progress.

As a co-founder of iSi Environmental and former Deputy Secretary for the Kansas Department of Health and Environment (KDHE), Gary has developed insight to the regulatory climate that businesses must operate under, and the systems and processes that facilitate compliance in a cost effective manner.

Mason’s appointment to NACEPT will run through November 30, 2020.

<https://isienvironmental.com/index.php/epa-council-blog/>

A. COORDINATION

1. There will be the fullest possible cooperation and coordination between EPA and OSHA, at all organizational levels, in developing and carrying out training, data and information exchange, technical and professional assistance, referrals of alleged violations, and related matters concerning compliance and law enforcement activity to ensure the health and well-being of the Nation's workforce, the general public, and the environment.

2. By January 1, 1991, and by the beginning of each succeeding fiscal year, EPA and OSHA will develop an annual workplan to identify and define the priorities to be addressed during the year. This workplan will include an identification of specific types of facilities to be jointly addressed during the year.

3. EPA and OSHA will exchange names and phone numbers of appropriate agency headquarters, regional and field personnel, including personnel in OSHA area offices, and in state program offices. All information will be kept up to date by both agencies. Each EPA and OSHA Regional Office will designate a point of contact for carrying out interface activities. Each agency agrees to prepare and distribute to all field personnel a suitable directive outlining a policy concerning the effective implementation of this MOU, and to identify appropriate points of contact. In order to aid in the enforcement and issue-referral process, the agencies will update this information as the need arises and will ensure that managers and field personnel are provided with a copy of this MOU and the relevant directive.

4. Resolution of interagency policy issues concerning this MOU and specific areas of implementation will be coordinated between EPA's Office of Enforcement and OSHA's Directorate of Policy. Resolution of issues concerning inspection and enforcement activity involving both EPA and OSHA jurisdiction also will be coordinated by EPA's Office of Enforcement and OSHA's Directorate of Policy.

B. INSPECTIONS

1. EPA and OSHA may conduct joint inspections as necessary to carry out the legislative purposes of the respective statutory authorities. Such inspections may be in accordance with an annual workplan which is developed by the two agencies and identifies areas for joint initiatives. Such inspections may also be scheduled on an ad hoc basis such as in investigations following accidents or fatalities or injuries to workers resulting from reported activities or situations subject to either EPA OR OSHA jurisdiction.

2. EPA and OSHA inspectors, in the course of conducting separate inspections, may discover situations involving potential violations of the other agency's laws or regulations. In those instances, referrals to the appropriate office will be undertaken as described below.

C. REFERRALS

1. For law enforcement purposes, OSHA and EPA shall develop a regular system to track and manage referrals of potential violations, allegations of violations, or situations requiring inspection, evaluation or followup by either Agency, as appropriate.

2. Although EPA does not conduct inspections for occupational safety, in the course of an EPA inspection, EPA personnel may identify safety concerns within the area of OSHA responsibility or may receive complaints about the safety or health of employees related to their working conditions. In such instances, EPA will bring the matter to the attention of OSHA designated contacts in the Regional Office. EPA inspectors are not to perform the role of OSHA inspectors; however, they will refer worker health and safety issues to OSHA pursuant to the procedures set forth in the MOU and implementing agency directives. In the case of worker complaints, EPA will disclose the name of individuals to OSHA but will not further disclose the name and the identity of the employee. When such instances occur within OSHA State-plan States' jurisdiction, the OSHA Regional Office will refer the matter to the State for appropriate action.

3. OSHA will inform the EPA Regional Administrator or appropriate EPA office of matters which appear to be subject to EPA jurisdiction when these come to their attention during Federal or State safety and health inspections or through worker complaints. Although not exhaustive, the following are examples of matters that would be reported to the EPA:

a. Worker allegations of significant adverse reactions to a chemical or chemical substance which poses a potential hazard to public health or the environment.

b. Accidental, unpermitted, or deliberate releases of chemicals or chemical substances beyond the workplace.

c. Unsafe handling, storage, or use practices involving chemicals, chemical substances, or waste materials in apparent violation of EPA-administered laws.

d. Other readily detectible potential violations of EPA-administered laws, such as by-passing treatment systems.

e. Asbestos dispersal or contamination affecting the public or the environment.

4. EPA shall respond to referrals from OSHA, and OSHA shall respond to referrals from EPA, concerning potential violations of the other agency's requirements, when appropriate, by conducting investigations in a timely manner. Referrals shall be evaluated and appropriate action will be taken.

5. OSHA will work to facilitate referrals of potential violations of EPA regulations to EPA and will encourage the relevant State agencies in those States which operate their own occupational safety and health programs (under a plan approved by OSHA under Section 18 of the OSH Act) also to make such referrals. EPA will work to facilitate referrals to OSHA or OSHA State-plan States of potential violations of occupational health and safety standards or regulations discovered by federal or state environmental inspection activities.

6. EPA and OSHA will conduct periodic meetings, as necessary, to report on the progress of actions taken on the other agency's referrals and to evaluate the effectiveness of the referral system and operating procedures. Both agencies agree to establish a system to monitor the progress of actions taken on referrals.

7. OSHA will encourage State-plan States to respond to referrals from EPA and State agencies concerning potential violations of the States' occupational safety and health standards or regulations by conducting investigations in a timely manner. OSHA will further encourage State-plan States to participate in all training and information-sharing activities established under this MOU.

D. DATA EXCHANGE

EPA and OSHA agree to exchange information relating to complaints, inspections of investigations, violations discovered, imposition of civil monetary penalties, or other legal actions taken to enforce pertinent laws and regulations, and all other information necessary to ensure effective and coordinated law enforcement. This MOU contemplates data exchange through both hard copy and computer data bases, in accordance with procedures to be established in a separate agreement.

Mold: Wet Weather & Flooding’s Living Liability

for Property and Health

It has been a very wet year in many parts of the U.S. With wet weather, the concern for potential mold growth in our facilities should be on the mind of building owners for property damage concerns, and environmental and safety managers for the potential worker health hazards it can cause.

**Locating the Mold**

Mold has always been with us. Some mold is expected in even the best kept buildings. Mold spores drift with the wind and are carried into our buildings on our clothing and on the feet of pets and vermin. Mold grows where it can feed and get enough moisture. Cellulose-based building materials like sheetrock, paper, vinyl wallpaper on exterior walls, and ceiling tiles are particularly vulnerable to mold growth when they get wet. They will never dry completely enough to be inhospitable to mold once it has started growing.

From our experience, the most common source of mold has come from roof leaks, broken pipes or flooding. Unfortunately, mold spores aren't always visible. They can be concealed inside wall cavities or behind molding strips and their toxins can still be felt by occupants.

Besides obvious water damage, the following signs may also indicate you have a mold issue.

* Musty smells
* Water stains
* Wet materials
* High humidity
* Dirty ducts, coils, and condensate pans
* Wet duct liners

**Control the Moisture**

Moisture problems must be fixed to prevent future mold growth. Since there are some mold spores everywhere and since mold grows on any wet organic surface, the only way to prevent mold growth is to keep things dry.

* Control water damage within 24-48 hours and work to dry the impacted area.
* If structural wood pieces, like studs, have stood in water, they need time to dry out.
* Moisture meters will show if the wood is below 15 percent moisture. If it is, you can replace drywall and similar materials.
* Even if the wood feels dry, it may still be too wet for rebuilding.
* Indoor humidity should be 30-60%, so dehumidifiers, air conditioners, and venting bathrooms, areas of cooking and dryers will aid in reducing overall humidity.

A general rule of thumb in assessing mold contamination is: the mold level in the air inside should be less than the level outside. (Buildings with mechanical ventilation systems typically see significantly lower levels inside.) Sampling and analysis can tell you your level of mold contamination.

**Health Effects**

Mold's effect on health has become a mainstream topic of discussion. One of the effects, an allergic reaction, is fairly easy to spot. Mold-related health effects can also come from a growing list of symptoms caused by mold-produced toxins. Black mold (s*tachybotrys chartarum)* isstill considered one of several potentially toxic molds affecting occupants of both commercial buildings and private homes. Other molds targeted as health concerns by the Environmental Protection Agency (EPA) and other agencies include: *Aspergillus, Penicillium, Fusarium* and *Trichoderma*.

**Mold Cleanup**

Cleanup of large areas of mold-damaged materials requires techniques similar to those used by the asbestos industry – personal protection for the workers, air filtration and proper disposal of contaminated materials. Mold, unlike asbestos, can grow back if the remediation is insufficient or done carelessly. It's a living organism that will continue to reproduce as long as building conditions permit. Improper handling can actually spread the spores, making the problem worse.

The goal of mold remediation is to correct the cause and remove the damaged materials that have supported excessive growth. This will return the building to a level of airborne mold that is consistent with the outside. Perhaps most importantly, allow occupants to work and live without fear of damage to their health.

**EPA Issues Methylene Chloride Ban for Consumers, Industry Use Continues**

EPA has issued a final rule to ban the use of methylene chloride for consumer use. This rule applies to the manufacture, import, process, and distribution of methylene chloride for consumer use. Industrial use, for now, is still allowed.

Methylene Chloride, also known as dichloromethane, is a key ingredient used in paint strippers. It also can be found in some acrylic cements for hobbyists.

EPA has been evaluating high-hazard chemicals through the Toxic Substances Control Act, or TSCA. EPA found the hazards associated with the methylene chloride to be an unreasonable risk. The fumes are heavier than air and can stay in an unventilated area for several hours. The fumes can rapidly cause dizziness, loss of consciousness, and death due to nervous system depression.

Retailers have 180 days after the rule finalization to be in compliance. However, many retailers made pledges to stop selling it long before the rule was finalized. Lowes, Home Depot, AutoZone, PPG and Sherwin Williams agreed to stop selling methylene chloride-containing products by the end of 2018. Walmart agreed to stop selling products online and in stores by the end of February 2019 and Amazon targeted March 2019. Ace Hardware is targeting the end of July 2019.

**Industrial Usage Continues**

In industry, methylene chloride is used not only as a paint stripper, but for general cleaning, automotive care, bath tub refinishing, metal cleaning and degreasing, lubrication, pharmaceutical manufacturing, and lithography.

EPA is still allowing usage in industry in industry at this time, but are is soliciting public comment for future rulemaking which may include training requirements, limited access rules, and/or certification.

On the employee protection side, methylene chloride usage in industry is also subject to OSHA’s Methylene Chloride Standard. This standard lines out specific requirements for usage, medical surveillance, respiratory protection, training, hygiene facilities, protective clothing, recordkeeping, and control measures.

**EPA’s Mercury Inventory Report Due July 1**

Any person, company or organization who manufactures or imports mercury or mercury-added products or intentionally uses mercury in a manufacturing process are required to file a report to EPA by July 1, 2019.

Called the “Mercury Inventory Reporting Rule,” it is a part of the Toxic Substances Control Act (TSCA). The final rule for this was published in June 2018. TSCA requires EPA to publish an inventory on mercury supply, use and trade every 3 years. EPA’s next inventory is due in 2020, so as a result, they are requiring those use and import mercury to get their data submitted by July 1, 2019.

If you fall under this requirement, it doesn’t matter how much mercury you use, you still need to report to EPA. Reporting is done through EPA’s Central Data Exchange.

The data you’ll use in the report are quantities from calendar year 2018. Some of the items required to be reported include:

* Amount of mercury produced, imported, stored, used, sold, or exported;
* Types of products made;
* Types of manufacturing processes and how mercury is used;
* Business sectors to which mercury or mercury-added products are sold;
* Country of origin of imported mercury or mercury-added products; and
* Destination country for exported mercury or mercury-added products.

Once submitted, you’ll be required to submit this report again every 3 years. EPA will not publish names or identifying information once they publish the results.

There are a few exemptions to reporting. In the following instances you won’t need to report:

* Your mercury activity isn’t for commercial advantage,
* The mercury you use is only as an impurity,
* You’re generating, handling or managing mercury-containing waste only (and not recovering it for commerce purposes)
* The mercury is in an assembled product that contains a mercury component (EPA gives the example of a mercury light bulb for a car manufacturer)
* You manufacture assembled products that contain a component that’s a mercury-added product but you didn’t manufacture or import that component

EPA is having two webinars to explain this Mercury Inventory Reporting Rule. One is [Tuesday May 21](https://www.eventbrite.com/e/mercury-inventory-reporting-rule-webinar-tickets-60219014694), the other is [Thursday May 23](https://www.eventbrite.com/e/mercury-electronic-reporting-mer-application-webinar-tickets-60220519194). Click on those dates to go to the signup page for each.

**Master Safety Audit Matrix**

| **Facility** | **Condition** | **Regulatory Standard** | **Corrective Action To Be Taken** | **Audit Date** | **Auditor** |
| --- | --- | --- | --- | --- | --- |
| **OSH Act** | | | | | |
| Perfekta | The solvents parts washer lid in the Compressor Room was left open when the unit was not in use (Photo 3). While there is no specific standard covering closed lids for solvent parts washers, OSHA has used the General Duty Clause to hold the employer responsible for failure to provide a work place free from recognized hazards (see Appendix E). | Section 5(a)(1) of General Duty Clause | Ensure that employees are trained to close the solvent parts washer while not in use. | 02/2017 | Scott |
| Champion Bus | **Minor** – Several forklift drivers were observed operating a forklift without the seat belt fastened. While there is no specific standard about wearing seat belts while operating a forklift, OSHA has stated that they will issue a citation under the General Duty Clause for failing to furnish a place of employment free from recognized hazards that are causing or are likely to cause death or serious physical harm to the employees. | Section 5(a)(1) of General Duty Clause;  Letter of Interpretation dated 10/09/1996 | Require all forklift operators to wear the seat belt while operating the forklift. Consider disciplinary action and retraining of the employees. | 03/2015 | Scott |
| Plant 3 | One forklift driver was observed operating a forklift without the seat belt fastened. While there is no specific standard about wearing seat belts while operating a forklift, OSHA has stated that they will issue a citation under the General Duty Clause for failing to furnish a place of employment free from recognized hazards that are causing or are likely to cause death or serious physical harm to the employees. | Section 5(a)(1) of General Duty Clause;  Letter of Interpretation dated 10/09/1996 | Require all forklift operators to wear the seat belt while operating the forklift. Consider disciplinary action and retraining of the employee. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | Several forklift drivers were observed operating a forklift without the seat belt fastened. While there is no specific standard about wearing seat belts while operating a forklift, OSHA has stated that they will issue a citation under the General Duty Clause for failing to furnish a place of employment free from recognized hazards that are causing or are likely to cause death or serious physical harm to the employees. | Section 5(a)(1) of General Duty Clause;  Letter of Interpretation dated 10/09/1996 | Require all forklift operators to wear the seat belt while operating the forklift. Consider disciplinary action and retraining of the employees. | 5-23-18 | Curtis Leiker |
| Atlas Aerospace | One instance of forklift operator using a cell phone while operating a forklift. OSHA considers “distracted driving” which can include texting (and potentially the use of cell phones for telephone calls) to be a “recognized hazard” under the General Duty Clause to employee safety. | Section 5(a)(1) of General Duty Clause;  Open letter in 2010 from Assistant Secretary of Labor to employers. | Mandate no cell phone policy while operating forklift. Consider disciplinary action and retraining of the employees. | 5-9-17 | Curtis Leiker |
| Kice | The mobile ladder stand (rolling stairs) is missing some of the rubber feet designed to keep the stairs from moving horizontally while employees are using it (Photo 3). While there is no specific standard covering the rubber tips for mobile ladder stands, OSHA has used the General Duty Clause to hold the employer responsible for failure to provide a work place free from recognized hazards (see Appendix B). | Section 5(a)(1) of General Duty Clause | Survey the facility and determine how many rubber feet need to be replaced and order a sufficient quantity and install them where needed. | 03/2017 | Scott |
| Kice Industries | Several mobile ladder stands (rolling stairs) is missing some of the rubber feet designed to keep the stairs from moving horizontally while employees are using it (see Photos 2307, 2323). While there is no specific standard covering the rubber tips for mobile ladder stands, OSHA has used the General Duty Clause to hold the employer responsible for failure to provide a work place free from recognized hazards. | Section 5(a)(1) of General Duty Clause | Survey the facility and determine how many rubber feet need to be replaced and order a sufficient quantity and install them where needed. | 5-16-18 | Curtis Leiker |
| Capps | Employees have been instructed to shelter within the ovens in the event of a tornado. When in use, the ovens can range in temperature between 130 degrees F to 250 degrees F. | Section 5(a)(1) of General Duty Clause | While there is no specific OSHA standard prohibiting the use of an oven for a tornado shelter, OSHA most likely would issue a citation under the General Duty Clause for failing to furnish a place of employment free from recognized hazards that are causing or are likely to cause death or serious physical harm to the employees. The facility should strongly consider using the restrooms as the designated tornado shelters and the Emergency Action Plan (EAP) should be revised to reflect this. Any revisions to the EAP will require training for all employees. | 06/2012 | Scott |
| Vermillion | The plywood that is supporting material storage on the industrial racking is bent significantly and could fail (see Photo 2503). There seems to be the horizontal support beams missing from the racking. | Section 5(a) of General Duty Clause;  ANSI MH-16.1: 2012 1.4.1 | Replace horizontal support members under the load to ensure that pallets are properly placed onto pallet load support members in a properly stacked and stable positions. | 7-23-18 | Curtis Leiker |
| PPK | The storage racks do not have load limits posted on each unit. While there is no specific standard covering storage racks, OSHA has used the General Duty Clause to hold employers responsible for rack safety including the use of the ANSI Standards. | Section 5(a) of General Duty Clause;  ANSI MH-16.1: 2012 1.4.2 | If possible, review the manual for the racking or contact the racking manufacturer to get the maximum permissible unit load and the maximum total load per bay. If this information is not available then a licensed engineer needs to determine the load limits for the storage racks in use. This information should be posted on each storage rack. | 11/2017 | Scott |
| PPK | The facility storage racks are not anchored to the floor (Photo 1). All rack columns shall be anchored to the floor with anchor bolts capable of resisting the forces caused by the horizontal and vertical loads on the rack. An alternative is to secure the racks to the building structure. While there is no specific standard covering storage racks, OSHA has used the General Duty Clause to hold employers responsible for rack safety including the use of the ANSI Standards. | Section 5(a) of General Duty Clause;  ANSI MH16.1:2012 1.4.7;  ANSI MH16.1;2012 1.4.10 | Anchor the storage racks to the floor. An alternative for storage racks in a single row positioned along the wall to be anchored to the building structure. | 11/2017 | Scott |
| Global Parts | The facility storage racks are not anchored to the floor (See Photo 1). All rack columns shall be anchored to the floor with anchor bolts capable of resisting the forces caused by the horizontal and vertical loads on the rack. An alternative is to secure the racks to the building structure. | Section 5(a) of General Duty Clause;  ANSI MH16.1:2012 1.4.7;  ANSI MH16.1;2012 1.4.10 | Anchor the storage racks to the floor. An alternative for storage racks in a single row positioned along the wall to be anchored to the building structure. | 8-19-21 | Curtis |
| Plant 2 | Industrial racking does not have load limits posted in several areas (see Photos 2295, 2327) and some racking is not secured in place where forklifts are used and tipping is likely (see Photo 2297). | Section 5(a) of General Duty Clause;  ANSI MH-16.1: 2012 1.4.2 | If possible, review the manual for the racking or contact the racking manufacturer to get the maximum permissible unit load and the maximum total load per bay. If this information is not available, then a licensed engineer needs to determine the load limits for the storage racks in use. This information should be posted on each storage rack. Racking where forklifts are used should be properly secured in place. | 5-16-18 | Curtis Leiker |
| Vermillion | The storage racks do not have load limits posted on each unit (see Photo 2502). While there is no specific standard covering storage racks, OSHA has used the General Duty Clause to hold employers responsible for rack safety including the use of the ANSI Standards. | Section 5(a) of General Duty Clause;  ANSI MH-16.1: 2012 1.4.2 | If possible, review the manual for the racking or contact the racking manufacturer to get the maximum permissible unit load and the maximum total load per bay. If this information is not available, then a licensed engineer needs to determine the load limits for the storage racks in use. This information should be posted on each storage rack. | 7-23-18 | Curtis Leiker |
| Kuhn | An employee’s workstation is located underneath the storage racks subjecting personnel to potential falling objects from above (Photo 6). While there is no specific standard covering workstations installed within storage racks, OSHA would most likely use the General Duty Clause to hold the employer responsible for failure to provide a work place free from recognized hazards. | Section 5(a)(1) of General Duty Clause | Move the employee’s work station. | 03/2016 | Scott |
| Vermillion | An employee’s workstation is located underneath the storage racks subjecting personnel to potential falling objects from above (Photo 2497). While there is no specific standard covering workstations installed within storage racks, OSHA would most likely use the General Duty Clause to hold the employer responsible for failure to provide a work place free from recognized hazards. | Section 5(a)(1) of General Duty Clause | Move the employee’s work station. | 07/2018 | Curtis Leiker |
| U.S. Ambulance | **Moderate** – The storage racks are not anchored to the floor (Photo 2756). All rack columns shall be anchored to the floor with anchor bolts capable of resisting the forces caused by the horizontal and vertical loads on the rack. | Section 5(a)(1) of General Duty Clause  ANSI MH16.1:2008 1.4.7 | Anchor the storage racks to the floor. | 04/2015 | Scott |
| Pioneer Balloon | Industrial racking does not have load limits posted in several areas (between screen and press room, in press room) and some racking is not secured in place where forklifts are used and tipping is likely. (See photos 1, 2, 3). | Section 5(a) of General Duty Clause;  ANSI MH-16.1: 2012 1.4.2 | If possible, review the manual for the racking or contact the racking manufacturer to get the maximum permissible unit load and the maximum total load per bay. If this information is not available then a licensed engineer needs to determine the load limits for the storage racks in use. This information should be posted on each storage rack. Racking where forklifts are used should be properly secured in place. | 2/28/18 | Curtis Leiker  Scott Smith |
| Atlas Aerospace | Industrial racking does not have load limits posted in several areas (see Photos 2228, 2243, 2245). | Section 5(a) of General Duty Clause;  ANSI MH-16.1: 2012 1.4.2 | If possible, review the manual for the racking or contact the racking manufacturer to get the maximum permissible unit load and the maximum total load per bay. If this information is not available, then a licensed engineer needs to determine the load limits for the storage racks in use. This information should be posted on each storage rack. | 5-9-18 | Curtis Leiker |
| Hillsboro Industries | The storage racks do not have load limits posted on each unit (see Photo 2342). While there is no specific standard covering storage racks, OSHA has used the General Duty Clause to hold employers responsible for rack safety including the use of the ANSI Standards. | Section 5(a) of General Duty Clause;  ANSI MH-16.1: 2012 1.4.2 | If possible, review the manual for the racking or contact the racking manufacturer to get the maximum permissible unit load and the maximum total load per bay. If this information is not available then a licensed engineer needs to determine the load limits for the storage racks in use. This information should be posted on each storage rack. | 5-23-18 | Curtis Leiker |
| NPC Valley Center | The storage rack outside of the Maintenance Department has a bent vertical member (see Photo 1). There is also a storage rack with a bent vertical member in the pigment storage area (see Photo 2). While there is no specific standard covering storage racks, OSHA has used the General Duty Clause to hold employers responsible for rack safety including the use of the American National Standards Institute (ANSI) standards. | Section 5(a) of General Duty Clause;  ANSI MH-16.1: 2012 1.4.1 and 1.4.9 | If possible, repair the damaged portion of the racks or replace the entire storage racks. | 10-9-18 | Curtis Leiker  Scott Smith |
| NPC Goddard | The flow through storage racks do not have load limits posted on each unit (see Photo 3). While there is no specific standard covering storage racks, OSHA has used the General Duty Clause to hold employers responsible for rack safety including the use of the ANSI standards. | Section 5(a) of General Duty Clause;  ANSI MH-16.1: 2012 1.4.2 | If possible, review the manual for the racking or contact the racking manufacturer to get the maximum permissible unit load and the maximum total load per bay. If this information is not available then a licensed engineer needs to determine the load limits for the storage racks in use. This information should be posted on each storage rack. | 10-9-18 | Curtis Leiker  Scott Smith |
| Pioneer Balloon | Beam T17B and P18A in the Warehouse were found to be significantly damage as to affect the overall capacity of the industrial raking and present a significant struck by hazard (see photo 4). | Section 5(a) of General Duty Clause; | Immediately replace damaged structures with safe components. | 2/28/18 | Curtis Leiker  Scott Smith |
| Atlas Aerospace | No safety latch on 1 ½ ton crane. Latch equipped hooks shall be used unless the application makes the use of the latch is impractical or unnecessary. | Section 5(a)(1) of General Duty Clause;  ASME B30.2-2011, 2-1.14.5 | Use a certified company to repair or replace safety latch in accordance with the American Society of Mechanical Engineers (ASME) standard. | 5-9-18 | Curtis Leiker |
| MPM | The safety latch on the 2 ton overhead crane is damaged (See Photo 3). | Section 5(a)(1) of General Duty Clause;  ASME B30.2-2011, 2-1.14.5 | Use a certified company to repair or replace safety latch in accordance with the American Society of Mechanical Engineers (ASME) standard. | 8-23-21 | Curtis |
| USD 259 | The Superior boiler (Photo 2) was last inspected on May 31, 2017. Boilers must be inspected on an annual basis. | Section 5(a) of General Duty Clause;  State of Kansas Boiler Safety Act Section 44-923 | Ensure that all boilers at the facility are inspected on an annual basis. | 7-30-18 | Scott Smith |
| Main Building Nutrition Services Boiler Room | There is no inspection certificate posted for the boiler in this area (Photo 3). | Section 5(a) of General Duty Clause;  State of Kansas Boiler Safety Act Section 44-923 | Ensure that all boilers at the facility are inspected on an annual basis. | 7-30-18 | Scott Smith |
| USD 259 | Personnel at the facility use harnesses and lanyards for personal fall protection (Photo 4). There is no program in place to conduct a periodic inspection of all personal fall arrest equipment including self-retracting lifelines and fall protection harnesses and lanyards. Fall protection equipment should be inspected at a minimum of annually for normal service use or monthly to quarterly for fall protection with severe service use. While there is no specific OSHA standard covering harness inspections, OSHA will use the General Duty Clause, incorporating the ANSI standards, to hold employers responsible for personal fall protection inspections. | Section 5(a) of General Duty Clause;  ANSI Z359.1-2016 6.1.1 | Either train someone internally to provide competent periodic fall protection inspections or contract with an outside company to inspect all fall protection equipment at least annually. | 7-30-18 | Scott Smith |
| Perfekta | There is no program in place to conduct a periodic inspection of all personal fall arrest equipment including self-retracting lifelines and fall protection harnesses and lanyards. Fall protection equipment should be inspected at a minimum of annually for normal service use or monthly to quarterly for fall protection with severe service use. While there is no specific OSHA standard covering harness inspections, OSHA will use the General Duty Clause, incorporating the ANSI standards, to hold employers responsible for personal fall protection inspections. | Section 5(a) of General Duty Clause;  ANSI Z359.1-2016 6.1.1 | Either train someone internally to provide competent periodic fall protection equipment inspections or use a third party to inspect all fall protection equipment at least annually. | 8/16/19 | Curtis |
| HOC | Walking/Working surfaces are not safe by tanks 21/22 (see Photo 3593) and have several issues that are recognized hazards, likely to cause serious harm, and are correctable. The step stool is not being used as intended, the piping is being used as steps, and no self-closing gate on the tank side of platform since it is 4 feet 2 inches in height. | Section 5(a) of General Duty Clause | Purchased or install an approved cross-over platform that meets OSHA’s requirements for walking/working surfaces. | 5/28/19 | Curtis |
| OSHA Citation 2015 | Employer was storage 225 pound barrel of 96%-100% sodium hydroxide together with a 225 pound barrel of 77%-100% sulfuric acid, exposing employees to fire and/or explosion harzards. | Section 5(a) of General Duty Clause | Need to separate incompatible chemicals for storage in accordance with NFPA 1, 60.5.1.12.1, 60.5.1.12.2, and 60.5.1.12.3 |  |  |
| OSHA Citation  2017 | Employer failed to protect employees from struck-by hazards by not providing audible back up alarms, high visibility clothing, and traffic warning signs. | Section 5(a) of General Duty Clause | Implement better program with audible alarms, high visibility clothing, and warning signs. |  |  |
| MPM | The Daewoo forklift does not have a seat belt installed on it for operator use (See Photo 4). | Section 5(a)(1) of General Duty Clause;  1910.178  LOI 10-9-1996 | OSHA’s stance of seat belt use change with the ANSI B56.1 consensus standard for powered industrial trucks revision in 1989. Employers are now required to provide a seat belt for all powered industrial trucks. The manufacturer must be contacted to see if the truck can be retrofitted with a seat belt. | 8-23-21 | Curtis |
| **Part 1903 – Inspections, Citations and Proposed Penalties** | | | | | |
| MPM | There is not a notice posted within the workplace that informs employees of the protections and obligations provided for in the OSH Act. | 1903.2(a)(1) | Post an “OSHA poster” with all the required notices contained within that describe employee protections and obligations contained within the OSH Act. | 8-23-21 | Curtis |
| **Part 1904 – Recording and Reporting Occupational Injuries and Illnesses** | | | | | |
| Global Parts | OSHA 300 logs are not being maintained for the previous 5 years. | 1904.1(a)(2) | Even though there may be no injuries, a documented OSHA 300 log must be maintained if employing more than 10 people at any time during the calendar year. See Appendix C. | 8-19-21 | Curtis |
| Electromech | The facility failed to record a Days Away From Work case (J. Bevan) on the 2012 OSHA 300 log. | 1904.4(a);  1904.4(a)(1);  1904.4(a)(2);  1904.4(a)(3) | Enter the information for the J. Bevan case on the original 2012 OSHA 300 log. The injury totals will also need to be adjusted on the OSHA 300A Injury Summary. | 11/2015 | Scott |
| Triumph – KC | Three injuries (Case No. 1, Case No. 2, and Case No. 4) listed on the 2016 OSHA 300 log are not classified as to what type of injury they are in Columns G, H, I, or J. Injuries should be classified by recording the most serious outcome associated with the case. As a result, the 2016 OSHA 300A Injury Summary is incorrect. | 1904.7; Instructions on OSHA 300 log; Appendix D - Example on Page 2 (#4 on right column under How To Work With The Log). | Determine the classification of each case and mark the corresponding circle in Column G, H, I, or J on the 2016 OSHA 300 log. Also, enter the total number of injuries for each injury classification on the corresponding column on the 2016 OSHA 300A Injury Summary. | 03/2017 | Scott |
| Auto Craft | The injury listed as R2 on the 2015 OSHA 300 log has 466 days away from work listed in Column K. The number of days away from work should be capped at 180. Therefore, the OSHA 300A Injury Summary is also incorrect. | 1904.7(b)(3)(vii) | Change the value in Column K of the injury listed as R2 on the 2015 OSHA 300 log to 180. Change the value for the Total Number of Days Away From Work in Column K on the OSHA 300A to 180. | 07/2017 | Scott |
| Custom Cupboards | Case #15 on the 2011 OSHA 300 log lists the Away From Work (days) (Column K) as 1.5 days. All days away from work should be counted as full days, not partial days. As a result, Column K on the 2011 OSHA 300A Summary of Work-Related Injuries and Illnesses is incorrect. | 1904.7(b)(3);  1904.7(b)(3)(i);  1904.32(b)(2)(i)  Appendix E  Example on Page 6 | Correct the original copy of the 2011 OSHA 300 log to reflect 2 days away from work for Case 15 and change the total number of days away from work on the original 2011 OSHA 300A summary to 61. | 02/2014 | Scott |
| Perfekta | The “On job transfer or restriction days” in Column L (Number of Days Section) for Case 1 of the 2014 OSHA 300 Injury Log is incorrect. The entry is marked as an “X.” | 1904.7(b)(4) | Change the value of Column L on the 2014 OSHA 300 Injury Log to 9. | 02/2017 | Scott |
| Auto Craft | Case R1 on the 2015 OSHA 300 log is listed as a “Job transfer or restriction” case (Column I) and an “Other recordable case” (Column J). Injuries should be classified by recording only the most serious outcome associated with the case which in this case would be “Job transfer or restriction” (Column I). As a result, the injury totals for Column I and Column J on the 2015 OSHA 300A Injury Summary are incorrect. | 1904.7;  1904.29;  Instructions on OSHA 300 form;  Appendix F - Example on Page 2 (#4 on right column under How To Work With The Log). | Remove the check mark under Column J for Case R1 on the original 2015 OSHA 300 log. Change the tally number at the bottom of the page for Column J from 2 to 0 (See Item 3 below). Change the tally number for Column J on the 2015 OSHA 300A from 2 to 0 (See Item 3 below). | 07/2017 | Scott |
| Figeac | The last case on the 2016 OSHA 300 log is listed as “Days away from work” (Column H) cases and “Job transfer or restriction” cases (Column I). Injuries should be classified by recording only the most serious outcome associated with the case which in this case would be “Days away from work” (Column H). As a result, the injury total for Column I on the 2016 OSHA 300A Injury Summary is incorrect. | 1904.7;  1904.29;  Instructions on OSHA 300 form;  Appendix F - Example on Page 2 (#4 on right column under How To Work With The Log). | Remove the check mark under Column I for the last case on the original 2016 OSHA 300 log. Change the tally number at the bottom of the page for Column I from 1 to 0. Change the tally number for Column I on the 2016 OSHA 300A from 1 to 0. | 01/2018 | Scott |
| Capps | A case number is not provided in Column A for all of the injuries on the 2011, 2012, and 2013 OSHA 300 logs. | 1904.7;  1904.29;  Appendix E  Example on Page 6 | Need to include a unique case number that corresponds to the OSHA 301 form (Injury and Illness Incident Report or equivalent) for each injury on the 2011, 2012 and 2013 OSHA 300 injury logs. | 06/2014 | Scott |
| Capps | The job title is not provided in Column C for all of the injuries on the 2011 OSHA 300 log. | 1904.7;  1904.29;  Appendix E  Example on Page 6 | Need to review all of the OSHA 301 forms or first report of injury for all of the injuries in 2011 and determine the job title for the injured employees and correct the 2011 OSHA 300 log. | 06/2014 | Scott |
| Capps | The location where the injury occurred is not provided in Column E for all of the injuries on the 2011 OSHA 300 log. The location is listed as simply “Capps” on 24 of 25 injuries on the 2012 OSHA 300 log and all of the injuries on the 2013 OSHA 300 log. | 1904.7  1904.29;  Appendix E  Example on Page 6 | Need to review all of the OSHA 301 forms or first report of injury for all of the injuries in 2011, 2012, and 2013 and determine the actual location where the event occurred (e.g. Loading dock, north end) and correct the appropriate OSHA 300 logs. | 06/2014 | Scott |
| Excel Industries | Several injuries listed on OSHA logs need reclassification as they are listed as injuries but should be listed as illnesses including heat stress illnesses and infections. Another injury should be classified as a skin condition. Specific injuries:  2015 – 1/6, 3/5, 4/22, 8/21, 12/3  2016 – 3/21, 6/21, 11/21  2017 – 1/20, 7/20  2018 – 11/21 | 1904.7;  1904.29 | Update classifications as applicable. Although the current Code of Federal Regulations states OSHA can look back 5 years on OHSA logs, the court case in 2012 AKM LLC v. Secretary of Labor limits OSHA to a 6-month statute of limitations. The current process for classifying injuries and illnesses should be reviewed to prevent future misclassification. | 12-2-19 | Curtis |
| Electromech | The establishment name and address are not provided on the 2014 OSHA 300 log. | 1904.29(b)(1);  Appendix E  Example on Page 6 | Enter the required information at the top of the original 2014 OSHA 300 log. | 11/2015 | Scott |
| FACC | OSHA 301 Injuries and Illnesses Incident Reports were available for 2014 injuries but there were no OSHA 301 forms available for 2015 injuries. | 1904.29(b)(2) | Complete an OSHA 301 or equivalent form for each recordable injury listed on the 2015 OSHA 300 log. | 04/2016 | Scott |
| Barkman Honey | The facility is not currently updating the OSHA 300 logs within 7 calendar days of receiving information that a recordable injury or illness has occurred. | 1904.29(b)(3) | Ensure the current OSHA 300 log is updated within 7 days when a new injury or illness occurs. OSHA logs must be presented to an OSHA compliance officer within 4 hours of request. | 2-11-22 | Curtis |
| Pet-Ag | Currently the facility is counting OSHA recordable injuries and illnesses of temporary employees onto the facility’s OSHA 300 log, but is not including total hours worked by these employees onto the 300-A annual summary. The employer is required to provide a reasonable estimate for hours worked and average employment on the annual summary. | 1904.31  Preamble Discussion: Section 1904.31 (66 FR 6037-6042, Jan. 19, 2001) | Begin tracking and maintaining records of hours worked by temporary employees and include on OSHA 300-A annual summary. | 9-14-21 | Curtis |
| Global Parts | The annual summary of the 300 log (OSHA 300-A Summary form) is not being completed and kept on file for 5 years. Missing years 2019, 2018, and partially missing in 2017, 2016, and 2015. | 1904.32(a) | Each year the OSHA 300-A form must be filled out and signed and kept on file for 5 years. | 8-19-21 | Curtis |
| NPC | An annual summary of 2018 injuries and illnesses was not created, certified, and posted in the workplace by February 1st. | 1904.32(a)(3)  1904.32(a)(4) | Create, certify, and post the 2018 OSHA 300-A summary form in a conspicuous place. | 02/2019 | Curtis |
| MPM | The OSHA 300-A annual injury summary log is not being posted in the facility from February 1 through April 30 of the following year. | 1904.32(a)(4) | Sign and post the OSHA 300-A form in a conspicuous place where notices to employees are customarily posted from February 1 through April 30 each year. See Appendix C. | 8-23-21 | Curtis |
| Champion Bus | The “Total number of cases with days away” number in Column H (Number of Cases Section) of the 2014 OSHA 300A Injury Summary is incorrect. The total number of injuries from Column H should be transferred to the OSHA 300A Injury Summary. | 1904.32(b)(2)(i) | **Corrected at the time of the audit**. Change the value of Column H on the 2014 OSHA 300A Injury Summary from 8 to 4. | 03/2015 | Scott |
| U.S. Ambulance | **Minor** – The “Total number of days of a job transfer or restriction” in Column L (Number of Days Section) of the 2012 OSHA 300A Injury Summary is incorrect. There are 335 days on the OSHA 300 log but only 306 day listed on the 300A Injury Summary. | 1904.32(b)(2)(i) | Change the value of Column L on the 2012 OSHA 300A Injury Summary to 335. | 04/2015 | Scott |
| Champion Bus | The “Total number of injuries” (Column M1) number in Column I (Injury and Illness Types Section) of the 2014 OSHA 300A Injury Summary is incorrect. The total number of injuries from Column M1 should be transferred to the OSHA 300A Injury Summary. | 1904.32(b)(2)(i) | **Corrected at the time of the audit**. Change the value of Column M1 on the 2014 OSHA 300A Injury Summary from 0 to 37. | 03/2015 | Scott |
| Kice Industries | Review of 2017 300A summary indicated that column L was not filled in. | 1904.32(b)(2)(i) | Place a “0” in the column L space on both the OSHA 300 log and 300A summary for 2017. | 5-16-18 | Curtis |
| E-ONE | **Minor** – The establishment addresses, the industry description, and the NAICS number is not provided on the 2013 OSHA 300A injury summary reports for all four facilities. | 1904.32(b)(2)(ii) | Enter the required information in the box on the right hand side of the original 2013 OSHA 300 injury summary report. | 05/2015 | Scott |
| Custom Cupboards | The “Annual average number of employees” and the “Total hours worked by all employees last year” values are missing from the OSHA 300A Summary of Work-Related Injuries and Illnesses for 2011 and 2013. The “Total hours worked by all employees last year” value was provided at a later date by Mr. Hudspeth. | 1904.32(b)(2)(ii) | Determine the average number of employees and total hours worked for both 2011 and 2013 and add this information to the original OSHA 300A Summary reports. | 02/2014 | Scott |
| Kice | The HR Manager has been signing the OSHA 300A annual injury summaries. OSHA requires that a company executive (owner of corporation, officer of corporation, highest ranking company official at the establishment, or the immediate supervisor of the highest ranking company official) is the only one within a company authorized to sign the annual OSHA 300A Injury Summary. | 1904.32(b)(3);  1904.32(b)(4);  1904.32(b)(4)(i) thru (iv) | Determine if the HR Manager meets these qualifications and correct the original copies of the OSHA 300A injury summaries if necessary. | 03/2017 | Scott |
| Kansas Ethanol | The Safety Manager signed off on the 2013 OSHA 300A annual summary log and HR Manager signed off on the 2014-15 logs. OSHA requires that a company executive (owner of corporation, officer of corporation, highest ranking company official at the establishment, or the immediate supervisor of the highest ranking company official) is the only one within a company authorized to sign the annual OSHA 300A Injury Summary. | 1904.32(b)(3);  1904.32(b)(4);  1904.32(b)(4)(i) thru (iv) | This facility has already corrected this deficiency with the CEO signing off on the 300A Injury Summaries starting in 2016. | 11/2018 | Curtis |
| Kice Industries | The HR Manager has been signing the OSHA 300A annual injury summaries. OSHA requires that a company executive (owner of corporation, officer of corporation, highest ranking company official at the establishment, or the immediate supervisor of the highest ranking company official) is the only one within a company authorized to sign the annual OSHA 300A Injury Summary. | 1904.32(b)(3);  1904.32(b)(4);  1904.32(b)(4)(i) thru (iv) | Determine if the HR Manager meets these qualifications or have a company executive sign the OSHA 300A summary log. | 5-14-19 | Curtis |
| Global Parts | The OSHA 300-A annual injury summary log is not being posted in the facility from February 1 through April 30 of the following year. | 1904.32(b)(5)  1904.32(b)(6) | Sign and post the OSHA 300-A form in a conspicuous place where notices to employees are customarily posted from February 1 through April 30 each year. | 8-19-21 | Curtis |
| Custom Cupboards | At the time of the safety audit (February 3, 2014), the 2013 OSHA 300A was not posted in a conspicuous place or places where notices to employees are customarily posted. The 2012 OSHA 300A was posted instead. | 1904.32(b)(6) | Employers must post the summary no later than February 1 of the year following the year covered by the records and keep the posting in place until April 30. The Human Resources Manager indicated that the 2013 OSHA 300A Injury Summary would be posted prior to the end of the week. | 02/2014 | Scott |
| Triumph – KC | The facility was not able to produce an OSHA 300 log for 2012 through 2015. Businesses must save the OSHA 300 Log, the privacy case list (if one exists), the annual summary (300A), and the OSHA 301 Incident Report forms for five (5) years following the end of the calendar year that these records cover. | 1904.33(a) | Recreate the missing 2012 through 2015 OSHA 300 logs and ensure that the proper documents for the past 5 years are available. | 03/2017 | Scott |
| ElDorado – KS | The facility was not able to produce recordkeeping documentation for 2010 or 2011. During these years the facility was owned by Thor Industries, Inc. New owners are not required to update or correct records of the prior owner but the new owner must save all OSHA recordkeeping documents from the prior owner. Businesses must save the OSHA 300 Log, the privacy case list (if one exists), the annual summary (300A), and the OSHA 301 Incident Report forms for five (5) years following the end of the calendar year that these records cover. | 1904.33(a)  1904.34 for business transfer of ownership requirements | Recreate the missing 2010 and 2011 OSHA recordkeeping documents and ensure that the proper documents from Thor Industries, Inc. for the past 5 years are available. | 10/2014 | Scott |
| Kice Industries | While the facility was able to produce historical OSHA 300A summary logs, it was not able to produce an OSHA 300 log for the previous 5 years. Businesses must save the OSHA 300 Log, the privacy case list (if one exists), the annual summary (300A), and the OSHA 301 Incident Report forms for five (5) years following the end of the calendar year that these records cover. | 1904.33(a) | If unable to find the records, the missing OSHA 300 logs for the previous 5 years should be recreated. | 5-14-19 | Curtis |
| MPM | While the facility was able to produce historical OSHA 300 and 300-A summary logs, it was not able to produce signed OSHA 300-A summary log for the previous 5 years. Businesses must save the OSHA 300 Log, the privacy case list (if one exists), the annual summary (300-A), and the OSHA 301 Incident Report forms for five (5) years following the end of the calendar year that these records cover. | 1904.33(a) | After creating the OSHA 300-A summary log, have the summary log signed by a company executive and keep a copy on file for 5 years. | 8-23-21 | Curtis |
| Global Parts | Employees are not instructed on how to report work related injuries and illnesses. | 1904.35(a)(1) | Develop new hire orientation material that includes information on how employees are to report work related injuries and illness. | 8-19-21 | Curtis |
| Barkman Honey | Employees are not formally instructed on how to report work related injuries and illnesses. | 1904.35(a)(1) | Develop new hire orientation material that includes information on how, when, and to whom employees are to report work related injuries and illness. | 2-11-22 | Curtis |
| Pioneer Balloon | Facility needs to electronically submit OSHA 300A Summary since facility has between 20-249 employees. | 1904.41(a)(2) | Start submitting OSHA 300A forms to OSHA’s website by specified date. 2016 due 12-31-17. 2017 due 7-1-18. Due March 2 on following years. | 2/28/18 | Curtis Leiker  Scott Smith |
| Kice Industries | Facility was not able to show that the OSHA 300A Summary was electronically submitted to OSHA for calendar year 2018. | 1904.41(a)(2) | Submit OSHA 300A Summaries to OSHA by March 2 for previous year injuries. | 5-14-19 | Curtis |
| NPC | Facility was not able to show that the OSHA 300A Summary was electronically submitted to OSHA for calendar year 2020. | 1904.41(a)(2) | Submit OSHA 300A summaries to OSHA by March 2 each year for previous year’s injuries. | 4-23-21 | Curtis |
| Global Parts | At the time of the audit, it was not known if the OSHA 300-A summary information had been submitted electronically to OSHA’s website. | 1904.41(a)(2) | Submit OSHA 300A summaries to OSHA by March 2 each year for previous year’s injuries if employing 20 or more employees at any one time during the calendar year. | 8-19-21 | Curtis |
| **Subpart D – Walking-Working Surfaces** | | | | | |
| Auto Craft | Trash and auto parts are being allowed to accumulate underneath and on top of the work bench in this area (Photos 161, 162). The employer must provide a place of employment that are kept in a clean, orderly, and sanitary condition. | 1910.22(a)(1) | Clean up the work area. | 07/2017 | Scott |
| USD 259 | There was significant accumulation of sawdust on the floors and equipment in these areas posing potential slip hazards and contributing to a combustible dust atmosphere. | 1910.22(a)(1);  NFPA 664 | Implement a regular cleaning program to maintain sawdust accumulations below 1/32nd inch at all times. | 7-30-18 | Scott Smith |
| NPC | The Paint Department needs better overall housekeeping. There are many instances of hoses or other materials on the floor throughout the area causing trip and slip hazards. The employer must provide a place of employment that is kept in a clean, orderly, and sanitary condition. | 1910.22(a)(1) | Improve housekeeping in this area by cleaning up the work area on a routine basis. | 5-17-19 | Curtis |
| HOC | The welding building needs better overall housekeeping. There are many instances of hoses or other materials on the floor throughout the area causing trip and slip hazards (see Photo 3587). Pallets were stored on end in Production Line 1 (see Photo 3611). The employer must provide a place of employment that is kept in a clean, orderly, and sanitary condition. | 1910.22(a)(1) | Improve housekeeping in this area by cleaning up the work area on a routine basis. | 5/28/19 | Curtis |
| NPC |  | 1910.22(a)(1) |  | 9/24/19 | Curtis |
| NPC | Excessive combustible dust accumulations are present at upper levels in the Line 7 area (see Photo 1). | 1910.22(a)(1)  1910.22(a)(2) | Upper levels in this area should be cleaned to eliminate the accumulation of combustible dust. These surfaces should be regularly cleaned to prevent future accumulations. Most loss prevention guidelines recommend a cleaning frequency to prevent any accumulations greater than 1/8”. | 4-23-21 | Curtis |
| MPM | The maintenance area needs better overall housekeeping. There are instances of hoses, fluids, or other materials on the floor throughout the area causing trip and slip hazards (See Photos 5, 6). The employer must provide a place of employment that is kept in a clean, orderly, and sanitary condition. | 1910.22(a)(1) | Improve housekeeping in this area by cleaning up the work area on a routine basis. | 8-23-21 | Curtis |
| Capps | An unused compressed air hose line was left in a walkway creating a trip hazard (See Photo 2). | 1910.22(a)(1) | Instruct employees to pick up air hose lines when not in use or install self-retracting hose reels to help keep the walkway free of trip hazards. | 1-12-22 | Curtis |
| USD 259 | The grate is missing for the floor drain next to the boiler (Photo 5) subjecting personnel to a trip hazard. | 1910.22(a)(3) | Replace the missing grating. | 7-30-18 | Scott Smith |
| NPC Valley Center | The hole in the metal plate over the sump in the Line 12 area is too large creating a trip hazard (see Photo 4). | 1910.22(a)(3) | Weld an additional plate so that there is only room to stick the hose through. | 10-9-18 | Curtis Leiker  Scott Smith |
| Pet-Ag | Wire is remaining from the concrete pad under the transformer creating a tripping hazard (See Photo 2). All walking / working surfaces should be free of hazards such as protruding objects. | 1910.22(a)(3) | Remove left over wire from the concrete forming system. | 9-14-21 | Curtis |
| NPC | A board is being used to prop open an exit door creating a tripping hazard (See Photo 1). All walking / working surfaces should be free of hazards. | 1910.22(a)(3) | Remove board from service and substitute with either a kick-down door stopper or a wedge to keep door propped open. | 6-22-22 | Curtis |
| PPK | There is material stored on the mezzanine and the flooring material does not completely cover the joists. There is no evidence through floor plans or an engineering analysis that documents the load rating for the mezzanine. | 1910.22(b) | Have a licensed engineer determine the load limit for the mezzanine area. An alternative would be to remove all of the material and post a sign to prohibit storage in this area. | 11/2017 | Scott |
| Pioneer Balloon | Employee must ensure that each walking working surface can support the maximum intended load for that surface. | 1910.22(b) | Verify mezzanine is able to withstand loads place upon it for walking/working. | 2/28/18 | Curtis Leiker  Scott Smith |
| MPM | A 10-ft A-frame ladder is being used as a non-self supporting (See Photo 7). Ladders should only be used for the purpose for which they were designed. | 1910.23(b)(8)  LOI #200801220-8196 | If access is needed to reach this area, purchase a non-self supporting ladder that is able to reach 3 feet beyond the upper landing surface. | 8-23-21 | Curtis |
| BG Products | The enclosed stairway to the mezzanine is 30 inches wide and does not have the required one handrail. | 1910.28(b)(11)(ii) |  | 09/2017 | Scott |
| PPK | There is not a program in place to conduct regular inspections of all walking / working surfaces. Inspection requirements went into effect in January, 2017 and include floors, aisles and walkways, stairways, ladders, runways, ramps, dockboards, and platforms. OSHA will allow the employer to determine when and how often these inspections are conducted. | 1910.22(d)(1) | Determine the frequency of the “regular” inspections (recommended annually). Conduct and document the inspection of the walking / working surfaces. See Appendix D for an example inspection form. | 11/2017 | Scott |
| Pioneer Balloon | There is not a program in place to conduct regular inspections of all walking / working surfaces. Inspection requirements went into effect in January 2017 and include floors, aisles and walkways, stairways, ladders, runways, ramps, dockboards, and platforms. OSHA will allow the employer to determine when and how often these inspections are conducted. | 1910.22(d)(1) | Determine the frequency of the “regular” inspections (recommended annually). Conduct and document the inspection of the walking / working surfaces. | 2/28/18 | Curtis Leiker  Scott Smith |
| Atlas Aerospace | There is not a full program in place to conduct regular inspections of all walking / working surfaces. Inspection requirements went into effect in January 2017 and include floors, aisles and walkways, stairways, ladders, runways, ramps, dockboards, and platforms. OSHA will allow the employer to determine when and how often these inspections are conducted. | 1910.22(d)(1) | Determine the frequency of the “regular” inspections (recommended annually). Conduct and document the inspection of the walking / working surfaces. | 5-9-18 | Curtis Leiker |
| Kice Industries | There is not a full program in place to conduct regular inspections of all walking / working surfaces. Inspection requirements went into effect in January 2017 and include floors, aisles and walkways, stairways, ladders, runways, ramps, dockboards, and platforms. OSHA will allow the employer to determine when and how often these inspections are conducted. | 1910.22(d)(1) | Determine the frequency of the “regular” inspections (recommended annually). Conduct and document the inspection of the walking / working surfaces. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | There is not a full program in place to conduct regular inspections of all walking / working surfaces. Inspection requirements went into effect in January 2017 and include floors, aisles and walkways, stairways, ladders, runways, ramps, dockboards, and platforms. OSHA will allow the employer to determine when and how often these inspections are conducted. | 1910.22(d)(1) | Determine the frequency of the “regular” inspections (recommended annually). Conduct and document the inspection of the walking / working surfaces. | 5-23-18 | Curtis Leiker |
| Pet-Ag | The small fixed ladder in the lower warehouse only has a width of 14 inches (See Photo 1). | 1910.23(b)(4) | Redesign the fixed ladder to ensure its width is at least 16 inches and all other design criteria in Subpart D is met. | 5-25-2022 | Curtis |
| Pioneer Balloon | Yellow four foot A-frame ladder was found to be bent and damaged (see photos 5,6). | 1910.23(b)(10) | Remove ladder from service. | 2/28/18 | Curtis Leiker  Scott Smith |
| USD 259 | The mobile ladder stand (rolling stairs) in this area has a damaged bottom step and side rail (Photo 6). Any ladder with structural or other defects should be immediately tagged "Dangerous: Do Not Use" or with similar language and removed from service until repaired or replaced. | 1910.23(b)(10) | Label the mobile ladder stand accordingly and repair the step or replace the mobile ladder stand. | 7/30/18 | Scott Smith |
| NPC Valley Center | The mobile ladder stand (rolling stairs) in the Line 12 area has a damaged frame member (see Photo 5). Any ladder with structural or other defects must be immediately tagged "Dangerous: Do Not Use" or with similar language and removed from service until repaired or replaced. | 1910.23(b)(10) | Label the mobile ladder stand accordingly and repair the bent frame member or replace the mobile ladder stand. | 10-9-18 | Curtis Leiker  Scott Smith |
| NPC | The mobile ladder stands (rolling stairs) on Line 7 (see Photo 3), Line 3 (see Photo 4), Line 4 (see Photo 5) and Line 15 (see Photo 6) have damaged frame member. Any ladder with structural or other defects must be immediately tagged "Dangerous: Do Not Use" or with similar language and removed from service until repaired or replaced. | 1910.23(b)(10) | Label the mobile ladder stand accordingly and replace the mobile ladder stand. | 4-23-21 | Curtis |
| Capps | The 12-foot A-frame portable ladder has damaged footing (See Photo 3). Any ladder with structural or other defects must be immediately tagged "Dangerous: Do Not Use" or with similar language and removed from service until repaired or replaced. | 1910.23(b)(10) | Remove the ladder from service and repair or replaced the ladder accordingly. | 1-12-22 | Curtis |
| NPC | A stepladder was missing rubber pads which are designed to keep the ladder from moving when used (See Photo 3). Any ladder with structural or other defects should be immediately tagged “Dangerous: Do Not Use” or with similar language in accordance with 1910.145 and removed from service until repaired in accordance with 1910.22(d), or replaced. | 1910.23(b)(10) | Survey the facility and determine how many rubber feet need to be replaced and order a sufficient quantity and install them where needed. | 9/28/22 | Curtis |
| NPC | A 14-foot A-frame ladder was placed in a bend position in front of a pedestrian door on Line 12 (see Photo 2). Ladders placed in passageways or doorways must be secured to prevent accidental displacement or guarded by a temporary barricade. | 1910.23(c)(7) | If the ladder is not being used, move to secure storage location. If ladder is being used, put proper safety measures in place to ensure the ladder cannot be hit by pedestrians moving through the doorway. | 4-23-21 | Curtis |
| D-J Engineering | The ladders on the sides of the rinse tanks (Photos 8, 9) do not meet the specifications for fixed ladders. Specifically, the distance from the ladder rung to the nearest permanent object in back of both ladders is less than 7 inches; and the rungs on the ladder in Photo 9 are not designed to keep the climber’s foot from sliding off the rung. | 1910.23(d)(2);  1910.23(d)(10); | Remove the ladder rungs or place a shield over the ladder rungs so that they can’t be used. | 12/2016 | Scott |
| Excel Industries | A fixed ladder to second level does not have side rails that extend 42 inches above the top access level (see Photo 4913). | 1910.23(d)(4) | Install extension grab bar that extends at least 42 inches above the level of the floor. | 12-2-19 | Curtis |
| MPM | A fixed ladder to upper platform does not have side rails that extend 42 inches above the top access level (See Photo 8). | 1910.23(d)(4) | Install extension grab bar that extends at least 42 inches above the level of the platform floor. | 8-23-21 | Curtis |
| Atlas Aerospace | A fixed ladder was observed on the vacuum pump platform with no extended railing at least 42” above platform (see Photo 2246). | 1910.23(d)(7) | Install grab bars that extend at least 42” above the access level served by the ladder. NOTE: Additional fall protection is required when working on this platform. | 5-9-18 | Curtis Leiker |
| Pegasus Labs | The mobile ladder stand (rolling stairs) in Room 29A is missing some of the rubber feet designed to keep the stairs from moving horizontally while employees are using them (Photo 281). | 1910.23(e)(1)(vii);  1910.23(e)(1)(viii) | Survey the facility and determine how many rubber feet need to be replaced and order a sufficient quantity and install them where needed. | 08/2017 | Scott |
| Pioneer Balloon | The 2 step ladder in Press Room is missing some of the rubber feet designed to keep the stairs from moving horizontally while employees are using it (see photo 7). 10 ft ladder in Warehouse doesn’t have rubber footing and lever was tied to prevent ladder from contacting ground (see photo 8). | 1910.23(e)(1)(vii)  1910.23(e)(1)(viii) | Survey the facility and determine how many rubber feet need to be replaced and order a sufficient quantity and install them where needed. | 2/28/18 | Curtis Leiker  Scott Smith |
| USD 259 | The mobile ladder stand (rolling stairs) in this area is missing some of the rubber feet designed to keep the stairs from moving horizontally while employees are using them (Photo 7). | 1910.23(e)(1)(vii);  1910.23(e)(1)(viii) | Survey the facility and determine how many rubber feet need to be replaced and order a sufficient quantity and install them where needed. | 7-30-18 | Scott Smith |
| Kansas Ethanol | The mobile ladder stands (rolling stairs) in these area are missing some of the rubber feet designed to keep the stairs from moving horizontally while employees are using them (see Photo 2888). | 1910.23(e)(1)(vii);  1910.23(e)(1)(viii) | Survey the facility and determine how many rubber feet need to be replaced and order a sufficient quantity and install them where needed. | 11-7-18 | Curtis Leiker |
| Kansas Ethanol | The mobile ladder stand (rolling stairs) is missing some of the rubber feet designed to keep the stairs from moving horizontally while employees are using them (see Photo 1). | 1910.23(e)(1)(vii);  1910.23(e)(1)(viii) | Survey the facility and determine how many rubber feet need to be replaced and order a sufficient quantity and install them where needed. | 6-26-19 | Curtis Leiker |
| MPM | There is a flight of stairs that has 6 risers that does not have a handrail on one side (See Photo 15). There is also a flight of stairs that has 4 risers without a stair rail system on each open side (See Photo 16). This stairs also does not have uniform riser height between landings (top step). Each flight of a stairs having at least 3 treads and at least 4 risers must be equipped with stair rail systems and handrails. | 1910.25(b)(3)  1910.25(c)  1910.28(b)(11)(ii) | Install a stairway handrail and stair rail system that complies with OSHA requirements in Table D-2 for each stairs. | 8-23-21 | Curtis |
| Barkman Honey | The West end stairs is significantly damaged and needs repair (See Photo 70). All stairways must be capable of supporting at least 5 times the normal anticipated live load and never less than a concentrated load of 1,000 pounds applied at any one point. | 1910.25(b)(6) | Repair or replace the stairway. | 2-16-22 | Curtis |
| Global Parts | There is a scissor lift in use in this area. There is no formal training taking place for employees who are required to use it. Scissor lifts are regulated as mobile scaffolding. General industry does not maintain scaffolding standards, and instead simply adopts the construction standard 1926 Subpart L. According to these standards, initial training is required for employees who use it. | 1910.27(a)  1926.452(w) by reference | Have employees who use the scissor lift get trained by a person qualified in the subject matter. Training should be documented. | 8-19-21 | Curtis |
| Global Parts | There is a double gate in the guardrailing of the mezzanine that exposes employees to falls greater than 4 feet during transferring of material (See Photo 2). | 1910.28(b)(1)  ANSI MH28.3:2009 | Install safety gate (pivot gate) that provides fall protection at all times during transfer or provide employees with personal fall protection system such as personal fall arrest, travel resistant, or positioning system. See Appendix D for example. | 8-19-21 | Curtis |
| Perfekta | Employees using the roof access ladder attached to the stairwell must stand on the top stairway handrail and then move to the other side of the ladder subjecting them to a fall of greater than 4 feet (Photo 6). | 1910.28(b)(1)(i) | Maintenance personnel stated that they use an alternate roof access. Remove the roof access ladder attached to the stairwell otherwise extend the ladder to the ground level and provide a suitable ladder cage. | 02/2017 | Scott |
| D-J Engineering | There are two unguarded 35 foot deep open pits in the Furnace #2 area in which personnel could accidentally walk into the pits. One is below the furnace (Photo 5) which is accessible when the moveable furnace is over the wash pit. The other is the wash pit (Photo 6) which is accessible when the furnace is over the dry pit. Employers must ensure that employees are protected by a fall of more than 4 feet to a lower level by one of the following: Guard rail system; Safety net system; or Personal fall protection system such as personal fall arrest, travel restraint, or positioning system. | 1910.28(b)(1)(i);  1910.28(b)(1)(i)(A);  1910.28(b)(1)(i)(B);  1910.28(b)(1)(i)(C) | Since a fixed standard guard rail with standard toe board on all exposed sides is not feasible, it is recommended that a floor hole cover of standard strength and construction be fabricated and moved into place when the furnace is not over either hole. While the cover is not in place, the floor hole shall be constantly attended by someone or shall be protected by a removable, temporary standard railing. | 12/2016 | Scott |
| D-J Engineering | There is no railing completely around the storage on top of the freezer in the Saw Shop (Photos 4, 7) possibly subjecting employees to a fall hazard greater than 4 feet. Employers must ensure that employees are protected by a fall of more than 4 feet to a lower level by one of the following: Guard rail system; Safety net system; or Personal fall protection system such as personal fall arrest, travel restraint, or positioning system. | 1910.28(b)(1)(i);  1910.28(b)(1)(i)(A);  1910.28(b)(1)(i)(B);  1910.28(b)(1)(i)(C) | A permanent railing should be installed. A standard railing shall consist of top rail, intermediate rail, and posts, and shall have a vertical height of 42 inches nominal from upper surface of top rail to floor, platform, runway, or ramp level. The top rail shall be smooth-surfaced throughout the length of the railing. The intermediate rail shall be approximately halfway between the top rail and the floor, platform, runway, or ramp. The ends of the rails shall not overhang the terminal posts except where such overhang does not constitute a projection hazard. | 12/2016 | Scott |
| NPC | An employee was observed standing on a step stool next to the guard rail, exceeding the minimum guard rail height of 42 inches exposing the employee to a fall greater than 4 feet (Photo 1). | 1910.28(b)(1)(i);  1910.28(b)(1)(i)(A);  1910.28(b)(1)(i)(B);  1910.28(b)(1)(i)(C); | Either raise the height of the guardrail or do not allow employees to gain additional height from a ladder or step stool. | 04/2017 | Ben |
| NPC Valley Center | A single chain is being used in lieu of a standard handrail on the Line 7 catwalk (see Photo 6) possibly subjecting employees to a fall hazard greater than 4 feet. Employers must ensure that employees are protected by a fall of more than 4 feet to a lower level by one of the following: Guard rail system; Safety net system; or Personal fall protection system such as personal fall arrest, travel restraint, or positioning system. | 1910.28(b)(1)(i);  1910.28(b)(1)(i)(A);  1910.28(b)(1)(i)(B);  1910.28(b)(1)(i)(C) | A permanent railing should be installed. A standard railing shall consist of top rail, intermediate rail, and posts, and shall have a vertical height of 42 inches nominal from upper surface of top rail to floor, platform, runway, or ramp level. The intermediate rail shall be approximately halfway between the top rail and the floor, platform, runway, or ramp. | 10-9-18 | Curtis Leiker  Scott Smith |
| NPC Goddard | While a self-retracting life line has been installed above the south material grinder, the lanyard attachment hook is positioned so that employees must climb up onto the conveyor belt to attach it to their harness possibly subjecting them to a fall hazard greater than 4 feet (see Photo 7). Employers must ensure that employees are protected by a fall of more than 4 feet to a lower level by one of the following: Guard rail system; Safety net system; or Personal fall protection system such as personal fall arrest, travel restraint, or positioning system. | 1910.28(b)(1)(i);  1910.28(b)(1)(i)(A);  1910.28(b)(1)(i)(B);  1910.28(b)(1)(i)(C) | Attach the lanyard attachment hook to a position on the adjacent platform so that employees can attach the lanyard to their harness while standing on the platform which provides rails for fall protection. | 10-9-18 | Curtis Leiker  Scott Smith |
| El Dorado Manufacturing Facility (EMF) | Employees must access the top of the trailers in the trailer unloading area (see Photo 1) without any fall protection to protect them from a fall greater than four feet to a lower level. | 1910.28(b)(1)(i)(A) thru (C) |  | 4-23-18 | Scott Smith |
| MPM | It appears employees may be walking on top of room for storage and to access materials (See Photo 9). If employees are walking on this level they need some form of fall protection as height of level is approximately 10 feet above ground level. | 1910.28(b)(1)(i);  1910.28(b)(1)(i)(A);  1910.28(b)(1)(i)(B);  1910.28(b)(1)(i)(C) | If possible, eliminate the need to store material on this level to eliminate fall hazard. If not able to eliminate, install guard railing or provide personal fall protection equipment and secured anchor point to attach lanyard to. | 8-23-21 | Curtis |
| MPM | Employees are accessing the platform on the back side of the Fidia which is 4’5” in height with no fall protection (See Photo 10). | 1910.28(b)(1)(i);  1910.28(b)(1)(i)(A);  1910.28(b)(1)(i)(B);  1910.28(b)(1)(i)(C) | Provide employees with a personal fall protection system such as personal fall arrest, travel resistant, or positioning system. | 8-23-21 | Curtis |
| MPM | The guard railing on top of the Shipping Office leaves a gap of 21 inches from the wall (See Photo 11). The maximum allowable distance for a gap in a guard railing system is 18 inches based on the definition of a wall opening. | 1910.28(b)(1)(i);  1910.28(b)(1)(i)(A);  1910.28(b)(1)(i)(B);  1910.28(b)(1)(i)(C)  1910.21 – Definition of Opening | Either extend the guard railing closer to the wall or put up a bollard in this location capable of withstanding 200 pounds of force. | 8-23-21 | Curtis |
| NPC | A 6-foot A-frame ladder was setup on an elevated platform that did not have fall protection provided prior to use of ladder (See Photo 3). | 1910.28(b)(1)(i);  1910.28(b)(1)(i)(A);  1910.28(b)(1)(i)(B);  1910.28(b)(1)(i)(C) | Ensure employees are using personal fall protection systems if working on this elevated platform. | 6-22-22 | Curtis |
| NPC | Two small areas exist on the 8-foot platforms that are open to a fall hazard (See Photos 12, 13). Equipment was 24 inches from the wall and the hydraulic equipment was 12.5 inches at the top and 16 inches at the mid-point from the wall. The maximum allowable distance for a gap in a guard railing system is 18 inches based on the definition of a wall opening. | Recommendation  1910.28(b)(1)(i)(A) thru (C)  1910.21 – Definition of Opening | Recommend providing fall protection on the fall side of the platform to prevent exposure to a fall hazard. | 6-22-22 | Curtis |
| Vermillion | There is a swinging double gate in the guardrailing of the mezzanine that exposes employees to falls greater than 4 feet during transferring of material (see Photo 2511). | 1910.28(b)(1)  ANSI MH28.3:2009 | Install safety gate that provides fall protection at all times during transfer or provide employees with personal fall protection system such as personal fall arrest, travel resistant, or positioning system. | 7-23-2018 | Curtis Leiker |
| Excel Industries | There is a double gate in the guardrailing of the mezzanine near Maintenance that exposes employees to falls greater than 4 feet during transferring of material (see Photo 4853). | 1910.28(b)(1)  ANSI MH28.3:2009 | Install safety gate that provides fall protection at all times during transfer or provide employees with personal fall protection system such as personal fall arrest, travel resistant, or positioning system. | 12-2-19 | Curtis |
| Pioneer Balloon | Verify skylights are designed to withstand employee standing or falling through skylight (see photo 9). Every skylight floor opening and hole shall be guarded by a standard skylight screen, a fixed standard railing on all exposed sides, a travel restraint system, or a personal fall arrest system. | 1910.28(b)(3) | Verify skylights can withstand weight of person, implement policy of no roof access, or install fall protection method | 2/28/18 | Curtis Leiker  Scott Smith |
| MPM | Employees need to work on top of roof for various tasks that has skylights. Verify skylights are designed to withstand employee standing or falling through skylight. Every skylight floor opening and hole shall be guarded by a standard skylight screen, a fixed standard railing on all exposed sides, a travel restraint system, or a personal fall arrest system. | 1910.28(b)(3)(i) | Verify skylights can withstand weight of person, implement policy of no roof access, or install fall protection method. | 8-23-21 | Curtis |
| Kice Industries | Unguarded hole against wall (see Photo 2322). Every employee must be protected from tripping into or stepping into or through any hole by covers or guardrail systems. | 1910.28(b)(3)(ii) | Cover hole with cover that is capable of supporting at least twice the intended load and is secured to prevent accidental displacement. | 5-16-18 | Curtis Leiker |
| Perfekta | Hinged floor guard on hole along north wall was left in open position. Every employee must be protected from tripping into or stepping into or through any hole by covers or guardrail systems. | 1910.28(b)(3)(ii) | Ensure all floor holes are properly covered and instruct employees not to leave covers off. | 8/16/19 | Curtis |
| MPM | There is an unguarded hole against the wall (See Photo 12). Every employee must be protected from tripping into or stepping into or through any hole by covers or guardrail systems. | 1910.28(b)(3)(ii) | Cover area with cover that is capable of supporting at least twice the intended load and is secured to prevent accidental displacement or install barrier to prevent walking into hole. | 8-23-21 | Curtis |
| MPM | There is an unguarded large opening on the back side of the Fidia (See Photo 13). Every employee must be protected from tripping into or stepping into or through any hole by covers or guardrail systems. | 1910.28(b)(3)(ii) | Cover area with cover that is capable of supporting at least twice the intended load and is secured to prevent accidental displacement or install barrier to prevent walking into opening in the floor. | 8-23-21 | Curtis |
| Barkman Honey | Unguarded 4 inch by 4 inch hole against in floor (See Photo 67). Every employee must be protected from tripping into or stepping into or through any hole that is at least 2 inches in its least dimension by covers or guardrail systems. | 1910.28(b)(3)(ii) | Cover hole with cover that is capable of supporting at least twice the intended load and is secured to prevent accidental displacement. | 2-16-22 | Curtis |
| Perfekta | There is no fall protection in place at the top of the ladder cage for the outdoor roof access (Photo 7). OSHA requires a self-closing swinging gate at fixed ladder openings. | 1910.28(b)(3)(iv) | Install a self-closing swinging gate at the ladder opening. | 02/2017 | Scott |
| Pioneer Balloon | There is no fall protection in place at the top of the fixed ladder on the Still (5 ½ feet) (see photo 10). Also, need swinging gate on fixed ladder above Restrooms in center of facility (see photo 11). OSHA requires a self-closing swinging gate at fixed ladder openings greater than four feet. | 1910.28(b)(3)(iv) | Install swinging gate at top of fixed ladders. | 2/28/18 | Curtis Leiker  Scott Smith |
| Building A | There is no fall protection in place at the top of the fixed ladder (see Photo 2226). OSHA requires a self-closing swinging gate at fixed ladder openings greater than four feet. | 1910.28(b)(3)(iv) | Install a self-closing swinging gate at the ladder opening. | 5-9-18 | Curtis Leiker |
| NPC Valley Center | There is no fall protection in place at the top of the ladder cage for the Line 7 catwalk (see Photo 8). In addition, there is no fall protection for the mid or top platforms for the exterior storage tanks (see Photo 9). OSHA requires a self-closing swinging gate at fixed ladder openings. | 1910.28(b)(3)(iv) | Install a self-closing swinging gate at the ladder openings. | 10-9-18 | Curtis Leiker  Scott Smith |
| Kansas Ethanol | Many fixed ladder openings have chains in lieu of a self-closing gate (see Photo 2875). OSHA requires a self-closing swinging gate at fixed ladder openings greater than four feet per new Walking-Working Surface Standard from January 2017. | 1910.28(b)(3)(iv) | Install a self-closing swinging gate at all fixed ladder opening greater than four feet. | 11-7-2018 | Curtis |
| NPC | The fixed ladder swinging gate by the Blenders (see Photo 3116) has the gate attached to the ladder handrails and thus is leaving a large distance from the ladder to the walking platform in which an employee could step into. | 1910.28(b)(3)(iv) | Either move the swinging gate inwards so it is vertical with the platform walking surface or install a floor cover to protect the gap in the floor between the ladder and platform. | 2-7-19 | Curtis |
| Pegasus Labs | It does not appear that the skylights throughout the facility have adequate protection to keep workers on the roof from falling more than 4 feet through the opening. Every skylight floor opening and hole shall be guarded by a standard skylight screen, a fixed standard railing on all exposed sides, a travel restraint system, or a personal fall arrest system. | 1910.28(b)(3)(i)(A) thru (D) | Either install one of the listed fall protection options or prohibit roof access through the implementation of a written no roof access policy. | 08/2017 | Scott |
| MPM | An employee was observed climbing on top of the guard railing and then on top of the scrap metal chip compactor to rake metal out of the tip dumpster into the compactor with no fall protection while the compactor was in operation. | 1910.28(b)(6) | Create a standard operating procedure for employee to follow when needing to rake scrap metal out of the tip dumpsters without subjecting themselves to fall hazards above dangerous equipment. A telescoping or extension pole or other means that keep the employees on ground level should be the first option. The equipment should also be turned off and locked out if working above it. | 8-23-21 | Curtis |
| USD 259 | The fixed ladder in this location may not meet the fall protection requirements due to the height of the ladder and lack of a previously installed ladder cage (Photo 15). Fixed ladders that extend more than 24 feet must be provided with fall protection. It could not be determined during the audit the exact height of the ladder. Prior to 11/18/16 ladder cages were an acceptable means of fall protection for fixed ladders; however, after that date, when a fixed ladder, cage, or well, or any portion of a section thereof, is replaced, a personal fall arrest system or ladder safety system must be installed in at least that section of the fixed ladder, cage, or well. | 1910.28(b)(9)(i);  1910.28(b)(9)(i)(C) | Determine if the ladder extends more than 24 feet above the lower level. If the height is greater than 24 feet, install a personal fall arrest system or ladder safety system. | 7-30-18 | Scott Smith |
| Barkman Honey | The East exterior stairway has a platform height exceeding 4 feet but the railing is not 42 inches high and does not have a mid-rail (See Photo 72). The middle exterior stairway has more than 4 risers and two open sides but does not have a stair rail in place on both sides (See Photo 71). | 1910.28(b)(11)(i)  1910.28(b)(11)(ii) | Install new stair rail and guard rail systems on both stairs that meet the requirements in 29 CFR 1910.28 and 1910.29. | 2-16-22 | Curtis |
| Perfekta | There is a flight of stairs to a platform that has 4 risers that does not have a handrail on the open side. Each flight of a stairs having at least 3 treads and at least 4 risers must be equipped with stair rail systems and handrails. | 1910.28(b)(11)(ii) | Install a stairway handrail that complies with OSHA requirements in Table D-2. | 8/16/19 | Curtis |
| NPC | There are two flights of stairs to a platform less than four feet high that have 4 risers that do not have a stair rail system and handrails. A 30-inch-tall platform with 4 risers by wastewater system (see Photo 4542) and a 36-inch-tall platform with 4 risers by Line 6 (see Photo 4549). Each flight of a stairs having at least 3 treads and at least 4 risers must be equipped with stair rail systems and handrails. | 1910.28(b)(11)(ii) | Install a stairway handrail that complies with OSHA requirements in Table D-2. Since platform height is less than four feet and stair width is less than 44 inches, just a handrail on the open side must be provided. Handrails must be between 30-38 inches | 9/24/19 | Curtis |
| Paragon | The guardrail on the stairway leading up to the Employee Lounge does not meet OSHA requirements (Photo 424). The top edge height of the top rail is 32 inches above the walking/working surface but it must be between 39 and 45 inches. There is no midrail located midway between the top rail and the walking surface. The intermediate vertical members are greater than the allowed 19 inches. | 1910.29(b)(1);  1910.29(b)(2);  1910.29(b)(2)(i);  1910.29(b)(2)(iii) | Either rebuild or replace the stairway so that it meets OSHA regulations. | 11/2017 | Scott |
| Atlas Aerospace | A single chain is used as guard railing to the chip pit (see Photo 2253). The top edge of guard railing must be 42 inches plus or minus 3 inches and an intermediate member must be installed at a height midway between the top edge and walking-working surface | 1910.29(b)(1)  1910.29(b)(2)(i) | Ensure top edge is at least 39 inches in all locations and install intermediate midrail halfway between top edge and walking-working surface. | 5-9-18 | Curtis Leiker |
| NPC | The guardrail on the second level of Blending Bay #5 has a top rail height of 36 inches and does not meet the OSHA requirements for standard guardrail height of 42 inches plus or minus 3 inches. | 1910.29(b)(1) | Ensure top edge is at least 39 inches in all locations and install intermediate midrail halfway between top edge and walking-working surface. | 2-7-19 | Curtis Leiker |
|  | The guardrail on the second level of the storage area (See Photo 17) has a top rail height of 36 inches and does not meet the OSHA requirements for standard guardrail height of 42 inches plus or minus 3 inches. | 1910.29(b)(1) | Ensure top edge is at least 39 inches in all locations between top edge and walking-working surface. Easiest option is just to add another top bar across at a total height of 42 inches. | 8-23-21 | Curtis |
| Kice Industries | Swinging gate on elevated platform has inadequate midrail not meeting requirements of standard guardrailing system at fixed ladder entrance. | 1910.29(b)(2) | Replace current swing gate with new gate that has midrail midway between the top edge and walking-working surface. | 5-16-18 | Curtis Leiker |
| PPK | The homemade stairs leading to the mezzanine areas do not meet OSHA standards (Photo 461). The stairs do not have uniform riser heights. In addition, the stairs do not include the required midrail. | 1910.25(b)(3);  1910.29(b)(1) | Rebuild the stairs so that the top edge height of the top rail is between 39 and 45 inches above the walking/working surface. The midrail must be located midway between the top rail and the walking surface. The intermediate vertical members must not be spaced greater than the allowed 19 inches. Stairs must have uniform riser heights and tread depths between landings. | 11/2017 | Scott |
| Dragoo Metal Works /  Ultra Clean Midwest | The facility uses portable ladders but has not provided training to employees on proper care, inspection, storage, and use of ladders. | 1910.30(b) | Conduct training for all employees who use portable ladders. Training is required initially, when changes render previous training inadequate, or there are inadequacies in knowledge or use of equipment. | 12-7-21 | Curtis |
| MPM | The facility uses portable ladders but has not provided training to employees on proper care, inspection, storage, and use of ladders. | 1910.30(b) | Conduct training for all employees who use portable ladders. Training is only required initially before use. | 8-23-21 | Curtis |
| Global Parts | The facility uses portable ladders but has not provided training to employees on proper care, inspection, storage, and use of ladders. | 1910.30(b) | Conduct training for all employees who use portable ladders. Training is only required initially before use. | 8-19-21 | Curtis |
| **Subpart E – Means of Egress** | | | | | |
| Champion Bus | There is only one exit door out of the flammable liquid storage room. The room is considered a high hazard contents area and is greater than 200 square feet so two exits are required out of the room. | 1910.36(b)(1);  1910.36(b)(3);  NFPA 101 – Life Safety Code  6.2.2.4;  7.11.4(1) thru (3) | Install a second means of egress from the room. | 03/2015 | Scott |
| Allied Labs | There is only one exit route from the building. The garage door cannot be considered an exit door. At least two exit routes must be available in a workplace to permit prompt evacuation of employees and other building occupants during an emergency. | 1910.36(b)(1) | Install a second pedestrian exit door. The exit routes must be located as far away as practical from each other so that if one exit route is blocked by fire or smoke, employees can evacuate using the second exit route. | 04/2013 | Scott/Keith |
| PBI Gordon – KC | Employees must climb a ladder to access the mezzanine area of this building (Photo 16). There is only one exit route from the mezzanine area. There must be at least two exit routes available to permit prompt evacuation of employees during an emergency. | 1910.36(b)(1) | Install a secondary exit ladder from the mezzanine. The exit ladders must be located as far away as practical from each other so that if one exit route is blocked by a fire or smoke, employees can evacuate using the second exit route. | 05/2013 | Scott |
| Perfekta | The pedestrian door to the outside in the Tooling Room is considered an emergency exit due to the chemicals and flammable liquids stored in the room. The door was locked at the time of the assessment. A dead bolt lock and a slide bolt lock are installed above the door knob (Photo 8). Personnel must be able to open an exit route door from the inside at all times without keys, tools, or special knowledge. | 1910.36(d);  1910.36(d)(1) | Ensure that the door remains unlocked during business hours. Consider removing the dead bolt lock and the slide bolt lock and installing standard exit door hardware. A device such as a panic bar that locks only from the outside is permitted on exit discharge doors. | 02/2017 | Scott |
| NPC | The emergency exit door in the maintenance shop does not have a door knob and employees must hook a finger into the opening to pull open the door (Photo 1). According to OSHA regulations, employees must be able to open an exit route door from the inside at all times without keys, tools, or special knowledge. | 1910.36(d);  1910.36(d)(1) | Install a standard door knob on the maintenance shop emergency exit door. | 07/2014 | Scott |
| BG El Dorado | The emergency exit pedestrian door to the outside had a retractable gate across the opening (see Photo 2). While the gate was unlocked at the time of the assessment, personnel must be able to open an exit route door from the inside at all times without keys, tools, or special knowledge. | 1910.36(d);  1910.36(d)(1) |  | 4-23-18 | Scott Smith |
| Champion Bus | **Major** – The emergency exit door in this area is hinged so that the door must be pulled open to exit from the inside (Photo 8). Any door that connects any room to an exit route must swing out in the direction of exit travel. | 1910.36(e)(2) | Remove the existing exit door and reinstall the door frame so that it opens in the opposite direction. | 03/2015 | Scott |
| Champion Bus | **Major** – The door to the flammable liquid storage room is hinged so that the door must be pulled to open to exit from the inside (Photo 7). The room is considered a high hazard contents area and therefore must swing out in the direction of travel. | 1910.36(e)(2)  NFPA 101 – Life Safety Code  6.2.2.4;  7.2.1.4.2 | Remove the existing exit door and reinstall the door frame so that it opens in the opposite direction. | 03/2015 | Scott |
| Perfekta | The emergency exit path through the door in the Tooling Room was blocked by two containers (Photo 9). | 1910.36(g)(2) | Ensure that fire exit aisles and pathways remain clear of equipment and materials and that a minimum path of 28 inches is maintained. | 02/2017 | Scott |
| NPC Valley Center | The emergency exit path through the door in the Receiving Warehouse area was blocked by pallets of material (see Photo 14). | 1910.36(g)(2) | Ensure that fire exit aisles and pathways remain clear of equipment and materials and that a minimum path of 28 inches is maintained. | 10-9-18 | Curtis Leiker  Scott Smith |
| Collins Bus | **Moderate** – The door behind the bake booth was being used as an emergency exit. There were directional signs at both ends of the booth pointing the way to the door. However, at some points along the path the aisle is less than the OSHA required 28 inches. | 1910.36(g)(2);  1910.36(g)(4);  1910.37(a)(3) | Remove the two directional exit signs. Note: Corrected during the audit. | 02/2015 | Scott |
| Kansas Ethanol | The emergency exit path through the door in the South Parts Warehouse area was blocked by a rolling ladder and other material (see Photo 2884). | 1910.36(g)(2)  1910.36(g)(4) | Ensure that fire exit aisles and pathways remain clear of equipment and materials and that a minimum path of 28 inches is maintained. | 11-7-18 | Curtis |
| Auto Craft | Flammable liquids are being stored under the exit route stairs to the mezzanine (Photo 84). Exit routes must be kept free of explosive or highly flammable furnishings or other decorations. | 1910.37(a)(1);  1910.106(d)(5)(i) | Remove any flammable or combustible materials from under the stairs. | 06/2017 | Scott |
| Pioneer Balloon | Flammable liquids (Acetate) are being stored under the exit route stairs to the mezzanine (see photo 12). Exit routes must be kept free of explosive or highly flammable furnishings or other decorations. | 1910.37(a)(1)  1910.106(d)(5)(i) | Remove any flammable materials from under the stairs | 2/28/18 | Curtis Leiker  Scott Smith |
| Hillsboro Industries | Flammable liquids in a flammable storage locker are being stored next to the emergency exit door (see photo 1). Exit routes must be kept free of explosive or highly flammable furnishings or other decorations. | 1910.37(a)(1)  1910.106(d)(5)(i) | Move the flammable storage away from the emergency exit door. OSHA does not provide an exact distance but just states there so be no limits on the use of the exit. Anything directly adjacent to the exit path should be moved. | 6/17/21 | Curtis |
| Pet-Ag | Flammable liquids in a flammable storage locker are being stored next to the emergency exit route (See Photo 4). Exit routes must be kept free of explosive or highly flammable furnishings or other decorations. | 1910.37(a)(1)  1910.106(d)(5)(i) | Move the flammable storage away from the emergency exit route. OSHA does not provide an exact distance but just states there so be no limits on the use of the route or exit. Anything directly adjacent to the exit path should be moved. | 9-14-21 | Curtis |
| Allied Labs | The south emergency exit door is blocked (Photo 8). | 1910.37(a)(3) | Remove the stored material. Exit routes must be free and unobstructed. No materials or equipment may be placed, either permanently or temporarily, within the exit route. | 04/2013 | Scott/Keith |
| NPC | The walkway from the upstairs offices which serves as an exit route is blocked with material (See Photo 4). | 1910.37(a)(3) | Remove the stored material. Exit routes must be free and unobstructed. No materials or equipment may be placed, either permanently or temporarily, within the exit route. | 6-22-22 | Curtis |
| Ametek | The emergency fire door is blocked with material which would prevent it from fully closing during a fire (Photo 1). | 1910.37(a)(4) | Ensure that the area around all fire doors remain free of material. Consider painting the floor to indicate the area which must remain clear. | 08/2014 | Scott/James |
| HOC | The emergency fire door was blocked with material which would prevent it from fully closing during a fire (see Photo 3608). | 1910.37(a)(4) | Ensure that the area around all fire doors remain free of material. Consider painting the floor to indicate the area which must remain clear. | 5/28/19 | Curtis |
| TECT Aerospace | The emergency lights do not work in several areas. Some examples are Building 1 (Photo 13); Building 10; Building 11. The emergency lights will come on when the test button is pushed if the lights are functioning properly. | 1910.37(a)(4) | Repair the emergency lights Since many of the emergency exit signs and emergency lights could not be reached during this audit, consider a facility wide inspection to test all of the emergency lighting. | 05/2014 | Scott |
| TECT Aerospace | The illuminated emergency exit sign back up batteries for the NE and NW pedestrian doors do not function correctly. The exit signs should brighten when the test button is pushed if the battery is functioning properly. | 1910.37(a)(4) | Repair the illuminated exit signs. Since many of the emergency exit signs and emergency lights could not be reached during this audit, consider a facility wide inspection to test all of the emergency lighting. | 05/2014 | Scott |
| Capps | There are numerous emergency exit signs and emergency lighting units in which the backup battery is burned out. A few examples are: Exit sign in south corner of building; Emergency light on south wall of Heat Treat; Emergency light in NW corner. The exit signs will brighten when the test button is pushed if the battery is functioning properly. The emergency lights will come on when the test button is pushed if the lights are functioning properly. | 1910.37(a)(4) | Replace all burned out backup batteries. Since many of the illuminated emergency exit signs and emergency lights could not be reached during this audit, consider a facility wide inspection to test all of the illuminated exit signs and emergency lighting. | 06/2014 | Scott |
| Atlas Aerospace | An illuminated emergency exit sign back up batteries did not function correctly. The exit signs should brighten when the test button is pushed if the battery is functioning properly. Exit lighting must be in proper working order at all times. | 1910.37(a)(4) | Replace batteries in exit sign and ensure it is properly working. | 5-16-18 | Curtis Leiker |
| Triumph – KC | There is no documentation that the emergency lighting is being tested every 30 days for 30 seconds or for 1 ½ hours annually. | 1910.37(a)(4);  NFPA 101 Life Safety Code, 7.9.3.1 | Begin testing the emergency lights monthly and annually and document the testing. | 03/2017 | Scott |
| Lubrication Engineers | The emergency lighting is not being tested for 1 ½ hours annually. | 1910.37(a)(4);  NFPA 101 Life Safety Code, 7.9.3.1 | The emergency lights are currently only being tested monthly. Begin testing the emergency lights for 1 ½ hours annually. A summary of the NFPA requirements for emergency light testing is included as Appendix C. | 03/2014 | Scott |
| Kansas Ethanol | While emergency lighting is being tested monthly, the emergency lighting is not being tested annually for 90 minutes. | 1910.37(a)(4)  NPFA 101 7.9.3 | Start completing functional testing of the emergency lighting annually for a minimum of 90 minutes. If the lighting is wired correctly (i.e. on the same circuit and ahead of any local switches as the normal lighting) then simply turn off the breaker to the normal lighting without disrupting power to other parts of the facility. Testing records need to be documented. | 6-26-19 | Curtis Leiker |
| Excel Industries | There is no documentation that the emergency lighting is being tested every 30 days for 30 seconds or for 1 ½ hours annually. | 1910.37(a)(4);  2018 NFPA 101 Life Safety Code, 7.9.3 | Begin testing the emergency lights monthly and annually and document the testing. Self-testing / self-diagnostic battery operated emergency lighting equipment is acceptable. | 12-2-19 | Curtis |
| Learjet – Tuscon, AZ | (a) Throughout the facility: Displaced ceiling tiles must be in proper working order at all times.  The NFPA requires that smoke barriers be provided to subdivide building spaces for the purpose of restricting  the movement of smoke (NFPA 101 8.5.1). | 1910.37(a)(4) | Safeguards designed to protect employees during an emergency must be in proper working order at all time.  NFPA requires that smoke barriers be provided to to subdivide building spaces for the purpose of restricting the movement of smoke, NFPA 1018.5.1.  In 1910.165(b)(1) ADOSH requires employee alarm systems to provide warning necessary for reaction time for safe escape of employees from the workplace or the immediate work area, or both. Missing ceiling tiles would delay the activation of detection and alarm systems, thereby decreasing the time for safe evacuation (29 CFR Part 1910.165(b)(1). | 2020 | ADOSH |
| MPM | An illuminated emergency exit sign is not functioning properly (See Photo 18). The exit signs should brighten when the test button is pushed if the battery is functioning properly. Exit lighting must be in proper working order at all times. | 1910.37(a)(4)  NFPA 101 Life Safety Code 7.9.3 | Replace batteries in exit sign and ensure it is properly working. NFPA suggests that emergency lighting is tested every 30 days for 30 seconds and for 90 minutes on an annually basis. Documentation should be maintained. | 8-23-21 | Curtis |
| Boss Tank | There is no evidence that the building has adequate emergency lighting for emergency egress. | 1910.37(b)(1) | Determine if emergency lighting exists in the building and if not, install lighting to OSHA standards. | 02/2013 | Scott |
| Pioneer Balloon | No exit sign above pedestrian doors (see photos 13, 14). | 1910.37(b)(2) | Install exit signs that are clearly visible. | 2/28/18 | Curtis Leiker  Scott Smith |
| Perfekta | There is no exit sign above the south pedestrian door next to the break area (Photo 10). | 1910.37(b)(2);  1910.37(b)(6);  1910.37(b)(7) | Exit signs must have the word "Exit" in plainly legible letters not less than six inches high, with the principal strokes of the letters in the word "Exit" not less than three-fourths of an inch wide. Each exit sign must be illuminated to a surface value of at least five foot-candles (54 lux) by a reliable light source and be distinctive in color. Self-luminous or electroluminescent signs are permitted. | 02/2017 | Scott |
| Faultless | **Minor** - There are no exit signs above the two front doors of the administration portion of the building (Photo 4). | 1910.37(b)(2);  1910.37(b)(6);  1910.37(b)(7) | The exit signs must have the word "Exit" in plainly legible letters not less than six inches high, with the principal strokes of the letters in the word "Exit" not less than three-fourths of an inch wide. Each exit sign must be illuminated to a surface value of at least five foot-candles (54 lux) by a reliable light source and be distinctive in color. Self-luminous or electroluminescent signs are permitted. | 02/2015 | Scott |
| Pegasus Labs | The direction of travel to the exit or exit discharge is not immediately apparent in the production corridor (Photo 285). Signs must be posted along the exit access indicating the direction of travel to the nearest exit and exit discharge. Additionally, the line-of-sight to an exit sign must clearly be visible at all times. | 1910.37(b)(2);  1910.37(b)(4);  1910.37(b)(6);  1910.37(b)(7);  NFPA 101 Life Safety Code | Install an exit sign in the corridor indicating the direction of travel to the nearest. The exit sign must have the word "Exit" in plainly legible letters not less than six inches high, with the principal strokes of the letters in the word "Exit" not less than three-fourths of an inch wide. Each exit sign must be illuminated to a surface value of at least five foot-candles (54 lux) by a reliable light source and be distinctive in color. Self-luminous or electroluminescent signs are permitted. | 08/2017 | Scott |
| Pet-Ag | The direction of travel to the exit or exit discharge is not immediately apparent near the trucker’s lounge from the Warehouse (See Photo 5). Signs must be posted along the exit access indicating the direction of travel to the nearest exit and exit discharge. Additionally, the line-of-sight to an exit sign must clearly be visible at all times. Also, the QA lab has two rooms and two routes to take while in the rooms. The doors leading back into the Warehouse should have an exit sign posted (See Photo 6). | 1910.37(b)(4);  1910.37(b)(6);  1910.37(b)(7);  NFPA 101 Life Safety Code | Install an exit sign above the doors indicating the direction of travel. The exit sign must have the word "Exit" in plainly legible letters not less than six inches high, with the principal strokes of the letters in the word "Exit" not less than three-fourths of an inch wide. Each exit sign must be illuminated to a surface value of at least five foot-candles (54 lux) by a reliable light source and be distinctive in color. Self-luminous or electroluminescent signs are permitted. | 9-14-21 | Curtis |
| ATC | The north west emergency exit path does not have exit signs indicating the direction of travel to the emergency exit once you have passed through the door from Mold Prep.  (Photo 5) | 1910.37(b)(4); | Post signs along the exit access indicating the direction of travel to the nearest exit and exit discharge. | 10/2014 | James |
| Perfekta | The east pedestrian exit door shown in Photo 11 is not considered an emergency exit door. Each doorway or passage along an exit access that could be mistaken for an exit must be marked “Not An Exit” or similar designation, or be identified by a sign indicating its actual use. | 1910.37(b)(5) | The doorway should be marked with a sign stating “Not An Exit.” | 02/2017 | Scott |
| Ametek | The exit door shown in Photo 3 was blocked with a table. Facility personnel indicated that this door actually is not an exit door. Each doorway or passage along an exit access that could be mistaken for an exit must be marked “Not An Exit” or similar designation, or be identified by a sign indicating its actual use (e.g., closet). | 1910.37(b)(5) | The exit sign should be removed and the doorway should be marked with a sign stating “Not An Exit.” | 08/2014 | Scott/James |
| MPM | An exit door (See Photo 19) was blocked with material storage. Facility personnel indicated that this door actually is not an exit door. Each doorway or passage along an exit access that could be mistaken for an exit must be marked “Not An Exit” or similar designation, or be identified by a sign indicating its actual use (e.g., closet). | 1910.37(b)(5) | Place a sign on the door stating “Not an Emergency Exit.” | 8-23-21 | Curtis |
| Faultless | **Minor** – The illuminated exit sign in the SW corner of the warehouse is burned out (Photo 5). | 1910.37(b)(6) | Repair the emergency exit sign. | 02/2015 | Scott |
| Hillsboro Industries | Emergency exit signs are not powered by a reliable light source (see Photos 2355, 2356). Each exit sign must be illuminated to a surface value of a least five foot-candles (54 lux) by a reliable light source. | 1910.37(b)(6) | Install properly illuminated exit signs at each emergency exit door. | 5-23-18 | Curtis Leiker |
| MPM | Emergency exit sign is not powered by a reliable light source (See Photo 20). Each exit sign must be illuminated to a surface value of a least five foot-candles (54 lux) by a reliable light source. | 1910.37(b)(6) | Install properly illuminated exit signs at each emergency exit door. | 8-23-21 | Curtis |
| Triumph – KC | There is no written Emergency Action Plan (EAP) in place that covers the following: Procedures for reporting a fire or other emergency; Procedures for emergency evacuation, including type of evacuation and exit route assignments; Procedures to be followed by employees who remain to operate critical plant operations before they evacuate; Procedures to account for all employees after evacuation; Procedures to be followed by employees performing rescue or medical duties; and The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan. | 1910.38(a);  1910.38(b); | Develop a written EAP that contains all of the requirements listed. The plan must be kept in the workplace and available for all employees to review. | 03/2017 | Scott |
| MPM | While there are policies in place that cover reporting fire and other emergencies, there is not a full written Emergency Action Plan (EAP) in place that covers **all** of the following:   * Procedures for reporting a fire or other emergency; * Procedures for emergency evacuation, including type of evacuation and exit route assignments; * Procedures to be followed by employees who remain to operate critical plant operations before they evacuate; * Procedures to account for all employees after evacuation; * Procedures to be followed by employees performing rescue or medical duties; and   The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan. | 1910.38(a);  1910.38(b); | Develop a written EAP that contains all of the requirements listed. The plan must be kept in the workplace and available for all employees to review. | 8-23-21 | Curtis |
| Global Parts | The facility is using the phone intercom system to alert for emergencies, however the phones are not able to be heard in the main warehouse areas. Employee alarm systems must be capable of being perceived above ambient noise in all affected portions of the workplace. | 1910.38(d)  1910.165(b)(2) | Either install speakers in these areas that are tied into the intercom system or provide air horns that can be used to alert these areas. | 8-19-21 | Curtis |
| Ametek | The emergency notification procedures listed in the EAP do not match what is practiced at the facility. | 1910.38(c)(1) | Update the emergency action plan to reflect the new emergency notification system. | 08/2014 | Scott/James |
| Kuhn | The Fire & Severe Weather Procedure (Emergency Action Plan) does not contain procedures for the required information: Procedures for reporting a fire or other emergency; Procedures, if any, to be followed by employees who remain to operate critical plant operations before they evacuate; Procedures to be followed by employees performing rescue or medical duties; and the name and job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan. | 1910.38(c)(2) thru (c)(6) | Revise the facility Emergency Action Plan to include the missing information. | 03/2016 | Scott |
| Barkman Honey | The facility maintains written plans for emergency response and fire safety, but the plans do not:   * Explicitly state the locations of the shelter-in-place area or evacuation assembly area. * The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan. | 1910.38(c)(2)  1910.38(c)(6) | Update the emergency plans to contain all of the requirements listed. The plan must be kept in the workplace and available for all employees to review. | 2-11-22 | Curtis |
| Mid Continent | The Emergency Action Plan does not contain procedures on how to account for employees and visitors after an evacuation. | 1910.38(c)(4) | Revise the facility Emergency Response Plan to include procedures to account for all personnel after an emergency including a map of assembly areas. | 06/2014 | Scott |
| Pegasus Labs | The facility uses several standard operating procedures (SOP) for their required Emergency Action Plan. SOP GNR 202.6 – Fire Evacuation does not contain the name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan. | 1910.38(c)(6) | Revise the SOP to include the required information. | 08/2017 | Scott |
| Electromech | While periodic training is conducted, there was no documentation that employees receive initial training on the Emergency Action Plan. Documented training is required when an employee is initially assigned; when an employee’s responsibilities change; or when the plan changes. | 1910.38(f)(1) thru (3) | Implement a new employee safety training program and include information on the Emergency Action Plan. All training should be documented. | 11/2015 | Scott |
| USD 259 | There was no documentation that employees receive initial training or periodic training on the Emergency Action Plan. Documented training is required when an employee is initially assigned; when an employee’s responsibilities change; or when the plan changes. | 1910.38(f)(1) thru (3) | Implement a new employee safety training program and include information on the Emergency Action Plan. All training should be documented. | 7-30-18 | Scott Smith |
| MPM | There was no documentation that employees receive initial training or periodic training on the Emergency Action Plan. Documented training is required when an employee is initially assigned; when an employee’s responsibilities change; or when the plan changes. | 1910.38(f)(1) thru (3) | Implement a new employee safety training program and include information on the Emergency Action Plan. All training should be documented. | 8-23-21 | Curtis |
| Auto Craft | There is no written Fire Prevention Plan that includes: A list of major fire hazards; Procedures to control accumulation of flammable and combustible waste materials; Procedures for regular maintenance of safeguards; The name and job title of employees responsible for maintaining equipment; and the name or job title of employees responsible for the control of fuel source hazards. | 1910.39(c)(1) thru (c)(5) | Develop a written Fire Prevention Plan that contains all of the requirements listed. The plan must be kept in the workplace and available for all employees to review. | 07/2017 | Scott |
| Perfekta | The Emergency Procedures PowerPoint does not include all necessary information for a Fire Prevention Plan that shall include: A list of major fire hazards; procedures to control accumulation of flammable and combustible waste materials; procedures for regular maintenance of safeguards; the name and job title of employees responsible for maintaining equipment; and the name or job title of employees responsible for the control of fuel source hazards. | 1910.39(a)  1910.39(b)  1910.39(c)(1) thru (c)(5) | Include all requirements of a written Fire Prevention Plan into the Emergency Procedures PowerPoint. The plan must be kept in the workplace and available for all employees to review. | 8/16/19 | Curtis |
| Excel Industries | The Hot Work and Flammable Material Storage policy does not contain all the required information of a written Fire Prevention Plan that includes: A list of major fire hazards; procedures to control accumulation of flammable and combustible waste materials; procedures for regular maintenance of safeguards; the name and job title of employees responsible for maintaining equipment; and the name or job title of employees responsible for the control of fuel source hazards. | 1910.39(a)  1910.39(b)  1910.39(c)(1) thru (c)(5) | Include all requirements of a written Fire Prevention Plan into the Hot Work and Flammable Material Storage policy or create a separate Fire Prevention Plan. The plan must be kept in the workplace and available for all employees to review. | 12-2-19 | Curtis |
| MPM | There is no written Fire Prevention Plan that includes:   * A list of major fire hazards; * Procedures to control accumulation of flammable and combustible waste materials; * Procedures for regular maintenance of safeguards; * The name and job title of employees responsible for maintaining equipment; and   The name or job title of employees responsible for the control of fuel source hazards. | 1910.39(a)  1910.39(b)  1910.39(c)(1) thru (c)(5) | Develop a written Fire Prevention Plan that contains all of the requirements listed. The plan must be kept in the workplace and available for all employees to review. | 8-23-21 | Curtis |
| Pet-Ag | The facility does not permit employees to fight incipient stage fires and requires total evacuation of the facility upon fire alarm, however there is no written Fire Prevention Plan that includes:   * A list of major fire hazards; * Procedures to control accumulation of flammable and combustible waste materials; * Procedures for regular maintenance of safeguards; * The name and job title of employees responsible for maintaining equipment; and   The name or job title of employees responsible for the control of fuel source hazards. | 1910.39(a)  1910.39(b)  1910.39(c)(1) thru (c)(5)  1910.157(a) and (b)  LOI 9-12-1986  OSHA Compliance Directive CPL 2-1.037 (7-9-2002) | Develop a written Fire Prevention Plan that contains all of the requirements listed. The plan must be kept in the workplace and available for all employees to review. See Appendixes C and D. | 9-14-21 | Curtis |
| MPM | Certain information of employee fire hazards are mentioned in the safety manual, however once the written Fire Prevention Plan is developed, addition information should be provided to employees. | 1910.39(d) | After developing a written Fire Prevention Plan, include training content into a new hire orientation training to provide information to employees on the fire hazards within the facility. | 8-23-21 | Curtis |
| **Subpart F – Powered Platforms, Manlifts, and Vehicle Mounted Work Platforms** | | | | | |
| Kuhn | There is no program in place to conduct a periodic inspection of all personal fall arrest equipment including self-retracting lifelines and fall protection harnesses and lanyards. Fall protection equipment should be inspected at a minimum of annually for normal service use or monthly to quarterly for fall protection with severe service use. | 1910.66 APP C | Either train someone internally to provide competent periodic fall protection inspections or contract with an outside company to inspect all fall protection equipment at least annually. | 03/2016 | Scott |
| Sonaca | Due to excessive wear, rope lanyard is defective (Photo 9). | 1910.66 APP C (f) | Remove noted lanyard from service. | 08/2012 | Scott / Ben |
| Kuhn | An order picker operator was observed wearing the required safety harness without securing the leg straps around each leg. | 1910.66 APP C III(d) | Instruct the employee on the correct use of the fall protection harness. | 03/2016 | Scott |
| Dragoo Metal Works | Employees are operating aerial lifts but do not receive formal training on equipment. | 1910.67(c)(2)(ii) | Have employees who use aerial lifts trained by a person qualified in the subject matter. Training should be documented. | 12-7-21 | Curtis |
| Figeac | A contractor employee was observed working from a boom lift without attaching his lanyard to the boom lift, thus exposing himself to a fall greater than 4 feet (Photo 470). | 1910.67(c)(2)(iv) | Ensure that all contract employees follow OSHA requirements. | 01/2018 | Scott |
| Kuhn | Facility personnel indicated that employees have been working out of the basket of the new boom lift without wearing the proper fall protection. | 1910.67(c)(2)(iii);  1910.67(c)(2)(v) | Train all personnel working from a boom lift to ensure that all personnel working from a boom lift wear a full body fall protection harness with a lanyard attached to the boom or basket. | 06/2016 | Scott |
| Kice Industries | Employee observed wearing harness and lanyard while operating aerial lift but it was not attached to lift. A personal fall arrest or travel restraint system shall be worn and attached to the boom or basket when working from an aerial lift. | 1910.67(c)(2)(v) | Ensure employees always have fall protection attached to aerial lifts even when moving lift at ground level. | 5-16-18 | Curtis Leiker |
| **Subpart G – Occupational Health and Environmental Control** | | | | | |
| Ametek | Abrasive blasting enclosures do not meet the exhaust ventilation requirements such that an excessive amount of dust is escaping the blasting enclosures. | 1910.94(a)(3)(i);  1910.94(a)(3)(i)(a) thru (c);  1910.94(a)(3)(i)(e);  1910.94(a)(4) | Install exhaust ventilation systems suitable for abrasive blasting enclosures. | 08/2014 | Scott/James |
| Electromech | There is no evidence that a recent evaluation has been performed for noise exposure for the different job tasks or locations. | 1910.95(a);  1910.95(b)(1) | Perform noise monitoring to determine if hearing protection and/or a Hearing Conservation Program is required. | 11/2015 | Scott |
| Pioneer Balloon | Generally high noise levels in Printing areas but no calibrated noise assessments completed. When information indicates that any employee’s exposure may equal or exceed an 8-hr TWA of 85dB, the employer shall develop and implement a monitoring program | 1910.95(d)(1) | Due to mandatory hearing conservation program and noise exposures exceeding 85 dB, calibrated noise assessments should be completed to identify employees for inclusion into program. | 2/28/18 | Curtis Leiker  Scott Smith |
| Harlow | Documentation of annual hearing evaluations for employees assigned to hearing conservation areas was not available. | 1910.95(g)(1);  1910.95(g)(2);  1910.95(g)(3) | Ensure that hearing testing is performed annually on all employees who work in the hearing conservation areas. | 02/2013 | Scott |
| NPC | Even though signs are posted requiring the use of hearing protection (Photo 4), several employees were observed throughout the facility without hearing protection. | 1910.95(i)(1);  1910.95(i)(2)(i);  1920.95(i)(2)(ii) | Enforce the hearing protection policy. | 06/2012 | Scott |
| Kansas Ethanol | One employee was observed in the facility without hearing protection in a designated area requiring hearing protectors. | 1910.95(i)(2)(i);  1910.95(i)(2)(ii) | Enforce the hearing protection policy. | 11/7/18 | Curtis Leiker |
| NPC | There was no evidence that a copy of the OSHA Occupational Noise Exposure standard was posted within the facility. | 1910.95(l)(1) | A copy of the OSHA standard (1910.95) should be posted in the facility. | 06/2012 | Scott |
| Bombardier | Moderate Non-Conformance - Building 14 South Paint Booth: Employees working in high noise area with compressed air without hearing protection. | 1910.95(i)(2);  1910.95(i)(2)(i);  1920.95(i)(2)(ii) | Consider frequent unannounced inspections to ensure proper PPE is worn. | 04/2012 | Scott |
| Sonaca | Sign on door entering shop area indicates that hearing protection is required in designated areas but there is no indication of designated areas within the facility. | 1910.95(i)(2);  1910.95(i)(2)(i);  1920.95(i)(2)(ii) | Conduct a facility noise survey to identify high noise areas and high noise operations and post appropriate signs. Noise dosimeter monitoring for employees will also need to be conducted to determine if a hearing conservation program is needed. | 04/2012 | Scott |
| TECT Aerospace | Training is not being conducted either initially or annually for employees that are in the Hearing Conservation Program. | 1910.95(k)(1);  1910.95(k)(2) | Ensure that initial and annual training is being performed for all employees exposed to noise at or above an 8-hour time weighted average of 85 decibels. | 05/2014 | Scott |
| **Subpart H – Hazardous Materials** | | | | | |
| Pegasus Labs | The cylinder cap is not in place on the nitrogen cylinder in the PPA Cage (Photo 255). Valve protection caps for a full or partially full cylinder designed to accept a cap shall always be in place and hand-tight except when these cylinders are connected for use. | 1910.101(b);  Compressed Gas Association Pamphlet P-1-2015 – Section 5.5 | Ensure that all cylinders are capped when not in use. | 08/2017 | Scott |
| Faultless | **Moderate** – The acetylene cylinder is not secured properly. The chain is too high to keep the cylinder from falling over (Photo 6). | 1910.101(b);  Compressed Gas Association Pamphlet P-1-2015 – Section 5.8.4 | Relocate chain attachment points so that they are on the upper two-thirds of cylinders. | 02/2015 | Scott |
| Perfekta | The Argon cylinder in the Maintenance Shop is not secured properly (Photo 12). | 1910.101(b);  Compressed Gas Association Pamphlet P-1-2015 – Section 5.8.4 | Chain or otherwise secure the cylinder to a fixed structure to keep it from falling over. | 02/2017 | Scott |
| Pioneer Balloon | Compressed gas cylinder found not to be properly secured (see photo 15). | 1910.101(b);  Compressed Gas Association Pamphlet P-1-2008 – Section 63.3.1.4.4 | Secure all cylinders with a chain or other restraining devices. | 2/28/18 | Curtis Leiker  Scott Smith |
| Atlas Aerospace | Compressed gas cylinders not properly secured (see Photo 2264). | 1910.101(b);  Compressed Gas Association Pamphlet P-1-2015 – Section 5.5 | Relocate chain attachment points so that they are on the upper two-thirds of cylinders and ensure employees are keeping them secured. | 5-9-18 | Curtis Leiker |
| Kansas Ethanol | Compressed gas cylinder found not to be properly secured (see Photo 2878). | 1910.101(b);  Compressed Gas Association Pamphlet P-1-2015 – Section 5.5 | Secure all cylinders with a chain or other restraining devices. | 11-7-18 | Curtis Leiker |
| NPC | Compressed gas cylinders not properly secured (see Photo 7). | 1910.101(b);  Compressed Gas Association Pamphlet P-1-2015  LOI 02-11-2015 | Relocate chain attachment points so that they are on the upper two-thirds of cylinders and ensure employees are keeping them secured. The method of securing cylinders is performance-based, but the cylinder should not be able to be tipped over in storage. | 4-23-21 | Curtis |
| Hillsboro Industries | Compressed oxygen gas cylinders not properly secured in storage (see Photo 2). | 1910.101(b);  Compressed Gas Association Pamphlet P-1-2015  LOI 02-11-2015 | Create secure attachment points so that they are on the upper two-thirds of cylinders and ensure employees are keeping them secured. The method of securing cylinders is performance-based, but the cylinder should not be able to be tipped over in storage. | 6-17-21 | Curtis |
| BG Products | Small propane bottles are being stored in the same flammable storage locker as flammable liquids | 1910.101(b)  LOI 4-19-1999  1910.110  NFPA 58 |  | 7-27-21 | Curtis |
| USD 259 | This shop is considered a single fire area. There are multiple paint cans and containers of flammable liquids that are stored outside of a flammable liquid storage room or flammable liquid storage cabinets (Photo 18). The quantity of flammable liquid that may be located outside of a storage room or storage cabinet in a building, or in any one fire area of a building (regardless if the containers are empty or full), shall not exceed:  1. 25 gallons of Category 1 flammable liquids in containers;  2. 120 gallons of Category 2, 3, or 4 flammable liquids in containers.  1. Category 1 shall include liquids having flashpoints below 73.4 °F (23 °C) and having a boiling point at or below 95 °F (35 °C);  2. Category 2 shall include liquids having flashpoints below 73.4 °F (23 °C) and having a boiling point above 95 °F (35 °C);  3. Category 3 shall include liquids having flashpoints at or above 73.4 °F (23 °C) and at or below 140 °F (60 °C); and  4. Category 4 shall include liquids having flashpoints above 140 °F (60 °C) and at or below 199.4 °F (93 °C). | 1910.106(a)(12) for definition of a Fire Area;  1910.106(a)(19)(i) thru (iv) for definitions of Category 1 thru 4;  1910.106(e)(2)(ii)(b);  1910.106(e)(2)(ii)(b)(1) thru (3);  10/14/2011 Citation for America’s Fiberglass Animals (Appendix E) | Review the Safety Data Sheets (SDSs) for the paint and other flammable liquids and determine what flammable liquid category each container belongs to. Purchase additional flammable liquid storage cabinets or reduce the amount of stored inventory so that the total amount of flammable liquids stored outside of the cabinets is met. | 7-30-18 | Scott Smith |
| Atlas | Many of the flammable liquid storage tanks are missing the bung covers over the vent openings (Photo 2). The only time the vent covers should be off is if the cabinet is vented outdoors through a fume exhaust system. | 1910.106  NFPA 30 Chapter 4-3.4 | The vent openings shall be sealed with the bungs supplied with the cabinet or with bungs specified by the manufacturer of the cabinet. | 08/2012 | Scott |
| Champion Bus | **Major** - Employees were observed using an open flame blow torch on heat shrink insulation inside the engine compartment of a truck. Open flames shall not be permitted in areas where flammable liquids are present. | 1910.106(b)(6);  1910.106(d)(7)(iii); 1910.106(e)(6)(i) | Use a non-flame producing heat gun for this task. | 03/2015 | Scott |
| Figeac | There is a single flammable liquid storage cabinet (Photo 3) that contains one drum of Isopropanol and one drum of Barsol A-2904 (110 gallons possible when full). Both of the materials are considered Category 2 flammable liquids. The maximum amount of Category 2 flammable liquids that can be stored in a single cabinet is limited to 60 gallons. | 1910.106(d)(3)(i);  1910.106(a)(19)(ii) for definition of Category 2 | Purchase another flammable liquid storage cabinet and move one of the drums. Limit the total capacity of all flammable liquid storage cabinets to 60 gallons. | 07/2014 | Scott |
| Auto Craft | Flammable liquids are being stored in non-flammable rated cabinet (Photos 1137, 1138). Flammable liquids must be stored in an approved storage cabinet meeting the requirements of 1910.106 and local fire codes. | 1910.106(d)(3)(ii);  1910.106(d)(3)(ii)(a) | Purchase an approved fire storage cabinet to be used for the storage of flammable liquids. | 06/2013 | Scott |
| APR – Downtown | The latch is broken on the flammable liquid storage cabinet located outside of the paint booths. The cabinet must be provided with a three-point lock. | 1910.106(d)(3)(ii)(a) | Repair the flammable liquid cabinet door latch or replace the cabinet. | 06/2017 | Scott |
| Mid Continent | The door to the paint storage room (Pump Room) in Building 1 was observed propped open. All openings shall be provided with approved self-closing fire doors and remain closed. | 1910.106(d)(4)(i) | Do not allow employees to prop the doors open. Consider installing a sign on the door stating that the door must remain closed at all times. | 06/2014 | Scott |
| Kice | The door to the paint storage room is not self-closing as required (Photo 5). All openings shall be provided with approved self-closing fire doors and remain closed. | 1910.106(d)(4)(i) | Install a self-closing device on the door and ensure that the door remain closed at all times. | 03/2017 | Scott |
| Tank Connection East | There is no evidence that the room is constructed to meet the required fire-resistive rating. | 1910.106(d)(4)(i) | 1. Openings to other rooms or buildings shall be provided with noncombustible liquid-tight raised sills or ramps at least 4 inches in height or the floor in the storage area shall be at least 4 inches below the surrounding floor. 2. Openings shall be provided with approved self-closing fire doors. 3. The room shall be liquid-tight where the walls join the floor. A permissible alternate to the sill or ramp is an open-grated trench inside of the room which drains to a safe location. | 02/2013 | Scott |
| Kice | The flammable liquid mixing room does not meet the OSHA construction requirements. A four inch raised sill is required or the storage area shall be at least 4 inches below the surrounding floor (Photo 6). The room shall be liquid-tight where the walls join the floor. A permissible alternate to the sill or ramp is an open-grated trench inside of the room which drains to a safe location. | 1910.106(d)(4)(i); | Construct a 4 inch raised seal for the door (will require that the door be raised or cut off to fit). Ensure that the room is liquid-tight where the walls join the floor. | 03/2017 | Scott |
| E-ONE | The flammable liquid mixing rooms do not meet the OSHA construction requirements. The rooms are not sealed, either to other rooms or the outside. The window at the SVO facility does not meet the fire rating as specified in NFPA 80. The doors were propped open and the window at SVO was open. A four inch raised sill is not present at the SVO facility. The fan located outside the window at the SVO facility does not meet the wiring requirements and is not rated for use in a flammable liquid storage area (Photos 6, 7). | 1910.106(d)(4)(i);  NFPA 80-1968 | Openings to other rooms or buildings shall be provided with noncombustible liquid-tight raised sills or ramps at least 4 inches in height or the floor in the storage area shall be at least 4 inches below the surrounding floor. Openings shall be provided with approved self-closing fire doors. The room shall be liquid-tight where the walls join the floor. A permissible alternate to the sill or ramp is an open-grated trench inside of the room which drains to a safe location. Where other portions of the building or other properties are exposed, windows shall be protected as set forth in the Standard for Fire Doors and Windows, NFPA No. 80-1968. | 05/2014 | Scott |
| Capps | The air conditioner does not meet the wiring requirements and is not rated for use in a flammable liquid storage area. (Photo 9). | 1910.106(d)(4)(iii) | Replace the air conditioner with unit that is suitable for use in Class I, Division 2 hazardous locations to prevent the ignition of any released flammable vapors. | 06/2014 | Scott |
| APR – Downtown | The Paint Storage Room does not have an internal ventilation system. Every inside storage room shall be provided with either a gravity or a mechanical exhaust ventilation system. Such system shall be designed to provide for a complete change of air within the room at least six times per hour. If a mechanical exhaust system is used, it shall be controlled by a switch located outside of the door. The ventilating equipment and any lighting fixtures shall be operated by the same switch. | 1910.106(d)(4)(iv) | Install a gravity or mechanical ventilation system that meets the requirements of the standard. | 06/2017 | Scott |
| ElDorado | There was no switch available to turn on the ventilation system for the flammable liquid storage room. The auditor was told that the system comes on automatically. | 1910.106(d)(4)(iv) | If a mechanical exhaust system is used, it shall be controlled by a switch located outside of the door. The ventilating equipment and any lighting fixtures shall be operated by the same switch. | 10/2013 | Scott |
| Champion Bus | **Moderate** – The switch for the mechanical exhaust ventilation system and overhead lighting is located inside the Flammable Liquid Storage Room (Photo 13). If a mechanical exhaust system is used, it shall be controlled by a switch located outside of the door to the room. | 1910.106(d)(4)(iv) | Have a licensed electrician re-wire the ventilation switch so that it is outside of the Paint Storage Room. The ventilation switch should also control the lighting fixtures. | 03/2015 | Scott |
| Custom Cupboards | The switches for the exhaust ventilation system and the room lighting fixtures for these two areas are on separate switches. The ventilating equipment and any lighting fixtures shall be operated by the same switch. | 1910.106(d)(4)(iv) | Have a licensed electrician re-wire the ventilation system and the interior room lighting so that they are controlled by the same switch. The switch must be on the outside of the room. | 02/2014 | Scott |
| Kice | Paint storage rooms are required to have six air exchanges per hour. There was no documentation available indicating the air turnover rate had been measured. Also, no periodic monitoring is being performed to verify this information. | 1910.106(d)(4)(iv) | Conduct a documented ventilation survey of the flammable liquid storage room and calculate the air exchanges per hour. Determine the minimum air flow that will produce the exchange rate based on the size of the room and have Maintenance conduct periodic air flow measurements using the minimum air flow values. See Appendix C for guidance on conducting a ventilation survey. | 03/2017 | Scott |
| Champion Bus | **Moderate** – The outside flammable liquid storage area is not graded in a manner to divert possible spills away from buildings or other exposures. | 1910.106(d)(6)(iii) | Ensure that the area is graded to divert spills away from the building. An alternative would be to surround the building with a curb at least 6 inches high. When curbs are used, provisions shall be made for draining of accumulations of ground or rain water or spills of flammable liquids. Drains shall terminate at a safe location and shall be accessible to operation under fire conditions. | 03/2015 | Scott |
| Champion Bus | **Minor** – The outside flammable liquid storage building currently has a fire extinguisher located inside of the building. OSHA regulations require that the fire extinguisher be located outside of the building but not more than 10 feet from the door opening into any room used for storage. | 1910.106(d)(7)(i)(a) | Relocate the existing inside fire extinguisher to the outside of the building. | 03/2015 | Scott |
| Atlas Aerospace | There are two five gallon containers of alcohol next to the paint booth that are not closed (Photo 3). | 1910.106(e)(2)(ii) | Require that all containers of flammable liquids be covered or closed when not in use and labeled appropriately. | 07/2014 | Scott |
| Paragon | The main shops at both locations are considered single fire areas. There are multiple drums and containers of flammable liquids that are either in use or being stored outside of a flammable liquid storage room or flammable liquid storage cabinets (Photo 419). The quantity of flammable liquid that may be located outside of a storage room or storage cabinet in a building, or in any one fire area of a building, shall not exceed:  1. 25 gallons of Category 1 flammable liquids in containers;  2. 120 gallons of Category 2, 3, or 4 flammable liquids in containers;  3. 660 gallons of Category 2, 3, or 4 flammable liquids in a single portable tank. | 1910.106(a)(12) for definition of a Fire Area;  1910.106(a)(19)(i) thru (iv) for definitions of Category 1 thru 4;  1910.106(e)(2)(ii)(b);  1910.106(e)(2)(ii)(b)(1) thru (3);  10/14/2011 Citation for America’s Fiberglass Animals (Appendix D) | By definition, MEK is considered a Category 2 flammable liquid. Therefore the two MEK drums shown in Photo 419, by themselves, are in compliance since there is only 110 gallons total if both drums are full. However, since the allotment per fire area is used up there can be no other flammable liquid containers in the building that are stored outside of a flammable liquid storage room or flammable liquid storage cabinets. Survey the facility to determine the total amount of flammable liquid containers in the main shop (single fire area). Construct a flammable liquid storage room that meets all of the OSHA construction requirements (see Appendix X). An alternative would be to place each drum of flammable liquid in a separate approved flammable liquid storage cabinet. The maximum allowed quantity of a Category 1, 2, or 3 flammable liquid in a cabinet is 60 gallons and for Category 4 the maximum gallons in a cabinet is 120 gallons. | 11/2017 | Scott |
| Hillsboro Industries | There are multiple drums and containers of flammable liquids that are either in use or being stored outside of a flammable liquid storage room or flammable liquid storage cabinets (see Photo 2366 and 2367). The quantity of flammable liquid that may be located outside of a storage room or storage cabinet in a building, or in any one fire area of a building, shall not exceed:  1. 25 gallons of Category 1 flammable liquids in containers;  2. 120 gallons of Category 2, 3, or 4 flammable liquids in containers;  3. 660 gallons of Category 2, 3, or 4 flammable liquids in a single portable tank. | 1910.106(a)(12) for definition of a Fire Area;  1910.106(a)(19)(i) thru (iv) for definitions of Category 1 thru 4;  1910.106(e)(2)(ii)(b);  1910.106(e)(2)(ii)(b)(1) thru (3); | By definition, MEK is considered a Category 2 flammable liquid. Survey the facility to determine the total amount of flammable liquid containers in the fire area. Construct a flammable liquid storage room that meets all of the OSHA construction requirements OR place each drum of flammable liquid in a separate approved flammable liquid storage cabinet. The maximum allowed quantity of a Category 1, 2, or 3 flammable liquid in a cabinet is 60 gallons and for Category 4 the maximum gallons in a cabinet is 120 gallons. | 5-23-18 | Curtis Leiker |
| Capps | There are multiple drums and containers of flammable liquids that are either in use or being stored outside of a flammable liquid storage room or flammable liquid storage lockers (See Photo 8). The quantity of flammable liquid that may be located outside of a storage room or storage locker in a building, or in any one fire area of a building, shall not exceed:  1. 25 gallons of Category 1 flammable liquids in containers;  2. 120 gallons of Category 2, 3, or 4 flammable liquids in containers;  3. 660 gallons of Category 2, 3, or 4 flammable liquids in a single portable tank.  City of Wichita requires flammable liquids over 10 gallons total to be stored in flammable liquid storage lockers. | 1910.106(a)(12) for definition of a Fire Area;  1910.106(a)(19)(i) thru (iv) for definitions of Category 1 thru 4;  1910.106(e)(2)(ii)(b);  1910.106(e)(2)(ii)(b)(1) thru (3);  City of Wichita  Ord. No. 51-552  International Fire Code 5704.3.4.4 | Survey the facility to determine the total amount of flammable liquid containers in the fire area. Construct a flammable liquid storage room that meets all of the OSHA construction requirements OR place each drum of flammable liquid in a separate approved flammable liquid storage locker. The maximum allowed quantity of a Category 1, 2, or 3 flammable liquid in a cabinet is 60 gallons and for Category 4 the maximum gallons in a cabinet is 120 gallons. | 1-12-22 | Curtis |
| Bombardier | Moderate Non-Conformance - Building 7 Upholstery Shop Spray Room: There was a very strong smell of solvent vapors within room where solvents were being transferred to other containers. | 1910.106(e)(2)(iii) | Require that spray booth remain in operation while using solvents. | 04/2012 | Scott |
| PPK | There is a drum of flammable liquid (Primary Amyl Acetate) in use in which the material in the drum is dispensed by gravity through a valve that is not an approved valve (Photo 467). Flammable liquids must be dispensed into other containers through an approved self-closing valve. | 1910.106(e)(2)(iv)(d) | Replace the existing valve with an approved self-closing valve for all flammable liquids that are being dispensed by gravity. | 11/2017 | Scott |
| Perfekta | Flammable liquid (MEK) is being transferred from a 55 gallon drum into smaller metal containers. The 55 gallon drum is properly grounded but it appears that there is no bonding wire used between the 55 gallon drum and secondary metal containers (Photo 13). | 1910.106(e)(6)(ii);  NFPA 77 | Provide a bonding wire and ensure that the two metal containers are bonded together during liquid transfer to prevent the buildup of static electricity (See Appendix F). | 02/2017 | Scott |
| Ametek | Flammable liquid is being transferred from 5 gallon containers into smaller metal containers. The 5 gallon containers are not properly grounded and it appears that there is no bonding wire used between the 5 gallon containers and secondary metal containers (Photo 7). | 1910.106(e)(6)(ii);  NFPA 77 | Ground the 5 gallon containers and provide a bonding wire and ensure that the two metal containers are bonded together during liquid transfer to prevent the buildup of static electricity. | 08/2014 | Scott/James |
| Ametek | The two flammable liquid drums are not properly grounded (Photo 8). | 1910.106(e)(6)(ii);  NFPA 77 | Provide a suitable earth ground for each of the 55 gallon drums to prevent the buildup of static electricity when material is added to the drum. | 08/2014 | Scott/James |
| Wheeled Coach | Material is being transferred from flammable liquid drums without the drums being properly grounded. Drums in these locations are grounded to aluminum siding at both the storage shed (Photo 8) and the paint building and to a wall mounted broom holder at the paint building (Photo 9). | 1910.106(e)(6)(ii);  NFPA 77 | A suitable earth ground system should be installed to ground the flammable liquid drums. A licensed electrician should test the system to ensure that zero electrical potential is achieved by the grounding system. | 05/2013 | Scott |
| Hillsboro Industries | MEK is being transferred from a 55-gallon metal drum (see Photo 3) with its ground not connected. | 1910.106(e)(6)(ii) | Ensure the ground connection is properly connected to a suitable earth ground point. | 6-17-21 | Curtis |
| Learjet – Arizona | Combustible waste and residue were not kept to a minimum, stored in covered metal receptacles, and disposed of daily. (a) Building Y: Cardboard boxes were stored in the flammables cabinet. The boxes were removed during the visit. (b) Building H: Absorbent material was stored in a flammables cabinet. Material was NOT removed during the visit. | 1910.106(e)(9)(iii) | Maintain good housekeeping as required. Do not store combustible waste in flammables cabinets. | 10-21-20 | ADOSH |
| Kice Industries | Combustible material was stored on top of flammable liquid storage cabinet (see Photo 2331). Storage of flammable liquids shall be kept free of unnecessary combustible material. | 1910.106(e)(9)(iv) | Remove storage of combustible material from flammable storage cabinet. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | Combustible material was stored on top of flammable liquid storage cabinet (see Photo 2369). Storage of flammable liquids shall be kept free of unnecessary combustible material. | 1910.106(e)(9)(iv) | Remove storage of combustible material from flammable storage cabinet. | 5-23-18 | Curtis Leiker |
| Kansas Ethanol | Combustible material was stored on top of flammable liquid storage cabinet (see Photo 2891). Storage of flammable liquids shall be kept free of unnecessary combustible material. | 1910.106(e)(9)(iv) | Remove storage of combustible material from flammable storage cabinet. | 11-7-18 | Curtis Leiker |
| Perfekta | Combustible material is being stored on top of and around flammable liquid storage cabinets. Storage of flammable liquids shall be kept free of unnecessary combustible material. NFPA 30 states a 5-foot distance free of combustible material from cabinets. | 1910.106(e)(9)(iv)  2018 NFPA 30 14.6.5 | Suggest to move flammable storage cabinets from under storage racks and against adjacent wall where other combustibles are not stored. Otherwise remove combustible material directly next to flammable storage cabinet. | 8-16-19 | Curtis |
| Dragoo Metal Works | Combustible material was stored on top of flammable liquid storage lockers (see Photo 8695). Storage of flammable liquids shall be kept free of unnecessary combustible material. NFPA 30 states a 5-foot distance free of combustible material from lockers. | 1910.106(e)(9)(iv)  2018 NFPA 30 14.6.5 | Remove storage of combustible material from on top of and around flammable storage locker. | 12-7-21 | Curtis |
| Capps | Both of the fire doors for the boiler room were observed propped open (Photos 3 and 4). | 1910.106(g)(6)(iii) | Ensure that boiler room doors remain closed at all times. There already are signs posted instructing that the doors should remain closed. | 06/2012 | Scott |
| Global Parts | At the time of the audit there was no evidence that the open-sided spray booth (See Photo 5) has had a ventilation study to verify the velocity of the open face of the booth is at least 100 linear ft/min. | 1910.107(b)(5)(i) | Complete a ventilation study to verify the face velocity is being met and maintained at all times. | 8-19-21 | Curtis |
| Electromech | The Binks open-faced paint booth does not have any type of fire suppression system (Photo 16). | 1910.107(b)(5)(iv) | Install an automatic sprinkler system in the paint booth. The space within the spray booth on the downstream and upstream sides of filters shall be protected with an approved automatic fire suppression system. | 11/2015 | Scott |
| Hillsboro Industries | A clear space of not less than 3 feet on all sides of the spray booths are not kept free from storage or combustible construction (see Photo 4). | 1910.107(b)(9) | Areas around the spray booth must have material storage kept free for at least 3 feet around the perimeter of the spray booths. | 6-17-21 | Curtis |
| Global Parts | A clear space of not less than 3 feet on all sides of the spray booth are not kept free from storage or combustible construction (See Photo 6). | 1910.107(b)(9) | Areas around the spray booth must have material storage kept free for at least 3 feet around the perimeter of the spray booth. See Appendix E. | 8-19-21 | Curtis |
| Electromech | The lighting fixtures being used in the Binks open-faced paint booth in the Sub Machine Department (Photo 17) and the Balancing paint booth (Photo 18) are not explosion-proof type approved for Class I, Group D locations. | 1910.107(c)(6) | Replace the lighting and all wiring within the booth with explosion-proof types approved for Class I, Group D locations. | 11/2015 | Scott |
| ATC | Pro Mix station and Gel Coat pumping stations are not grounded. (Photos 17 and 18) | 1910.107(c)(9)(i) | All piping systems conveying flammable liquids shall be properly grounded in an effective and permanent manner. | 10/2014 | James |
| Boss Tank | The air hose hanging on the wall has a leak (Photo 10). | 1910.107(e)(6)(iii) | Any hose showing material deteriorations, signs of leakage, or weakness in its carcass or at the couplings, shall be withdrawn from service and repaired or discarded. | 02/2013 | Scott |
| E-ONE | **Minor** – There is one sprinkler head that does not have a plastic or cellophane bag installed for paint overspray residue protection (Photo 2672). Sprinkler heads shall be protected against paint overspray residue, either by location or covering, so that they will operate quickly in event of fire. | 1910.107(f)(3);  NFPA 33: 9.4.7;  NFPA 33: 9.4.7.1  NFPA 33: 9.4.7.2 | Determine if the exposed head has been covered, “gummed up,” or made non-functional with paint overspray and repair or replace it per the OSHA standard if necessary. Otherwise, sprinklers shall be permitted to be covered only by cellophane bags having a thickness of 0.08 mm (0.003 in.) or less or by thin paper bags. These coverings shall be replaced frequently so that heavy deposits of paint residue do not accumulate on the fire protection sprinkler head. | 04/2015 | Scott |
| Excel Industries | The material used on the sprinkler heads in the touch-up paint booth was unknown at the time of the audit. Sprinkler heads are required to be protected by overspray but may only be protected by either cellophane (not plastic) of 0.076 mm or less or thin paper bags. | 1910.107(f)(3)  2020 NFPA 25 5.4.1.9  2018 NFPA 33 9.6.7 | Ensure only approved coverings are used and replace periodically so that heavy deposits of residue do not accumulate. | 12-2-19 | Curtis |
| APR | The paint booths do not have any type of fire suppression system. | 1910.107(b)(5)(iv) | Install an automatic sprinkler system in the paint booths. The space within the spray booth on the downstream and upstream sides of filters shall be protected with approved automatic sprinklers. | 12/2012 | Scott |
| Sonaca | Operator was observed doing touch-up painting with spray gun outside of the paint booth with chrome based paint. | 1910.107(g)(1) | Require that all spray paint operations be conducted within paint booth. | 04/2012 | Scott |
| Atlas Aerospace | Propane tank not secured on forklift #6 as it was not placed into locking pin (see Photo 2247). Permanent and removable fuel containers shall be securely mounted to prevent jarring loose, slipping, or rotating. | 1910.110(e)(4)(iii) | Ensure employees are properly securing propane tank onto forklift or repair any damaged components. | 5-9-18 | Curtis Leiker |
| Allied Labs | The facility has hazardous materials on site with the potential for spills and releases. There is no evidence that employees are trained in the Hazardous Waste Operations and Emergency Response (Hazwoper) standard. | 1910.120(a);  1910.120(a)(1)(v);  1910.120(e)(1)(i) | All employees working on site exposed to hazardous substances, health hazards, or safety hazards and their supervisors and management responsible for the site shall receive training before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards. | 04/2013 | Scott/Keith |
| Ultra Clean Midwest | The facility has hazardous materials on-site with the potential for spills and releases. There is no evidence that employees are trained in the Hazardous Waste Operations and Emergency Response (HAZWOPER) standard. | 1910.120(q)(6) | Either (1) contract with a spill response provider who can respond timely to all chemical spills or (2) train employees working on-site exposed to hazardous substances, health hazards, or safety hazards and their supervisors and management responsible for the site in spill response that could expose them to hazardous substances, safety, or health hazards. | 12-8-21 | Curtis |
| Kuhn | The facility is using what appears to be an old Coca-Cola cooler as a parts washer (Photo 18). The lid does not have an approved automatic device to close the lid in lieu of an automatic fire extinguishing system. | 1910.125(f)(3);  OSHA 2012 Cives Steel Company citation (See Appendix H) | Replace the cooler with a parts washer that has a fusible link or other approved device to close the lid in the event of a fire. | 03/2016 | Scott |
| **Subpart I – Personal Protective Equipment** | | | | | |
| Ametek | The PPE provided does not match the PPE required for the hazard assessment. Employees use PVC gloves when handling Methylene Chloride. PVC gloves are not recommended for Methylene Chloride due to permeation rate. | 1910.132(d)(1)(i);  1910.138(a) | Provide the proper gloves per the PPE assessment and remove unapproved gloves from the area. | 08/2014 | Scott/James |
| Triumph – KC | There is no evidence that a personal protective equipment (PPE) evaluation & hazard assessment has been conducted for each task. | 1910.132(d)(1);  1910.132(d)(1)(i);  1910.132(d)(1)(ii);  1910.132(d)(1)(iii);  1910.132(d)(2) | Conduct and document a PPE hazard assessment for each task performed within the facility. | 03/2017 | Scott |
| Atlas Aerospace | There is no evidence that a personal protective equipment (PPE) evaluation & hazard assessment has been conducted for each task. | 1910.132(d)(1);  1910.132(d)(1)(i);  1910.132(d)(1)(ii);  1910.132(d)(1)(iii);  1910.132(d)(2) | Conduct and document a PPE hazard assessment for each task performed within the facility. | 5-9-18 | Curtis |
| Kice Industries | There is no evidence that a personal protective equipment (PPE) evaluation & hazard assessment has been conducted for the workplace. The assessment shall include a written certification that identifies the workplace evaluated, person certifying the evaluation and the date(s) of the assessment. | 1910.132(d)(1);  1910.132(d)(1)(i);  1910.132(d)(1)(ii);  1910.132(d)(1)(iii);  1910.132(d)(2) | Conduct and document a PPE hazard assessment for tasks performed within the facility through a documented and certified hazard assessment. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | There is no evidence that a personal protective equipment (PPE) evaluation & hazard assessment has been conducted for the workplace. The assessment shall include a written certification that identifies the workplace evaluated, person certifying the evaluation and the date(s) of the assessment. | 1910.132(d)(1);  1910.132(d)(1)(i);  1910.132(d)(1)(ii);  1910.132(d)(1)(iii);  1910.132(d)(2) | Conduct and document a PPE hazard assessment for tasks performed within the facility through a documented and certified hazard assessment. | 5-23-18 | Curtis Leiker |
| Pet-Ag | The facility has conducted a personal protective equipment (PPE) evaluation through their job safety analyses (JSAs) but the JSAs do not have a written certification that identifies the person certifying the evaluation. The assessment shall include a written certification that identifies the workplace evaluated, person certifying the evaluation and the date(s) of the assessment. | 1910.132(d)(2) | Update a master copy of the JSAs that includes a written certification by the person(s) completing the evaluation. | 9-14-21 | Curtis |
| Hillsboro Industries | While employees receive periodic training, there is no documentation that employees receive initial personal protective equipment (PPE) training. Documented training is required initially, preceding the use of PPE and then periodically if changes in the workplace or changes in the PPE render previous training obsolete. | 1910.132(f)(2);  1910.132(f)(3) | Implement a new employee safety training program and include information on PPE for all employees required to wear PPE. All training should be documented. | 06/2016 | Scott |
| MPM | There is no documentation that employees receive initial personal protective equipment (PPE) training. Documented training is required initially, preceding the use of PPE and then periodically if changes in the workplace or changes in the PPE render previous training obsolete. | 1910.132(f)(1) thru (3) | Implement a new employee safety training program and include information on PPE for all employees required to wear PPE. All training should be documented. | 8-23-21 | Curtis |
| Perfekta | Numerous employees were observed throughout the facility without safety glasses and/or side shields. OSHA requires that employees use appropriate eye or face protection when exposed to eye or face hazards from flying particles or liquid chemicals. Side shield protection is required when there is a hazard from flying objects. Detachable side protectors (e.g., clip-on or slide-on side shields) are acceptable. | 1910.133(a)(1) thru (3) | Enforce the safety glasses policy. | 02/2017 | Scott |
| Atlas Aerospace | Numerous employees were observed throughout the facility without safety glasses and/or side shields. OSHA requires that employees use appropriate eye or face protection when exposed to eye or face hazards from flying particles or liquid chemicals. Side shield protection is required when there is a hazard from flying objects. Detachable side protectors (e.g., clip-on or slide-on side shields) are acceptable. | 1910.133(a)(1) thru (3) | Enforce the safety glasses policy. | 5-9-18 | Curtis Leiker |
| Hillsboro Industries | Numerous employees were observed throughout the facility without side shields. One employee was observed cutting with circular saw without side shields. OSHA requires that employees use appropriate eye or face protection when exposed to eye or face hazards from flying particles or liquid chemicals. Side shield protection is required when there is a hazard from flying objects. Detachable side protectors (e.g., clip-on or slide-on side shields) are acceptable. | 1910.133(a)(1) thru (3) | Update safety glasses policy to include the use of side shields with safety glasses. | 5-23-18 | Curtis Leiker |
| Perfekta | Employees were observed throughout the facility without side shields on prescription eyewear. OSHA requires that employees use appropriate eye or face protection when exposed to eye or face hazards from flying particles or liquid chemicals. Side shield protection is required when there is a hazard from flying objects. Detachable side protectors (e.g., clip-on or slide-on side shields) are acceptable. The prescription glass eyewear should also meet the same impact rating as normal safety glasses. | 1910.133(a)(1) thru (3) | Require and/or provide employees with side shield protection for prescription eyewear and ensure eyewear meets ANSI impact rating. | 8/16/19 | Curtis |
| MPM | The facility generally requires eye protection throughout the facility including tasks of: grinding, chipping, buffing, chemical handling, cutting , and other operations where particles are likely to be present. Employees were observed throughout the facility without side shields on prescription eyewear. OSHA requires that employees use appropriate eye or face protection when exposed to eye or face hazards from flying particles or liquid chemicals. Side shield protection is required when there is a hazard from flying objects. Detachable side protectors (e.g., clip-on or slide-on side shields) are acceptable. The prescription glass eyewear should also meet the same impact rating as normal safety glasses. | 1910.133(a)(1) thru (3) | Require and/or provide employees with side shield protection for prescription eyewear and ensure eyewear meets ANSI impact rating. | 8-23-21 | Curtis |
| Pet-Ag | An employee was observed in Production using a spray bottle of Tough Duty cleaning chemical without any protective eyewear. The SDS states it has a pH of 11.5 to 12.2 and recommends wearing splash goggles. OSHA requires that employees use appropriate eye or face protection when exposed to eye or face hazards from flying particles or liquid chemicals. | 1910.133(a)(1) thru (3) | Require and/or provide employees to wear appropriate eye protection while using cleaning chemicals. | 9-14-21 | Curtis |
| Allied Labs | The Allied Lab written program for eye protection does not specifically address compliance with employees that wear prescription lens safety glasses | 1910.133(a)(3) | Update the written program to address prescription safety lens safety glasses. | 04/2013 | Scott/Keith |
| Hillsboro Industries | Employee was using plasma arc cutter with no shaded eye protection. Each affected employee shall have a shade number appropriate for the work being performed for protection from injurious light radiation. | 1910.133(a)(5) | Implement protective eyewear for employees doing plasma arc cutting. | 7-10-19 | Curtis |
| BG Products | Robot welder employee needs shaded glasses for arc welding | 1910.133(a)(5) |  | 7-27-21 | Curtis |
| El Dorado – KS | A helper was observed in the north paint booth without a respirator while his co-worker was painting a few feet away while wearing a respirator. | 1910.134(a)(1);  1910.134(a)(2) | Enforce the site Respiratory Protection Program. | 10/2014 | Scott |
| PBI Gordon – KC | There are no respirators available for the employees who unload DMA. A strong ammonia smell was present during unloading operations. | 1910.134(a)(2) | Industrial hygiene monitoring should be conducted to determine level of respiratory protection. At a minimum, an escape respirator or self-contained breathing apparatus (SCBA) should be provided for emergency use. |  |  |
| Perfekta | There are several jobs in which the employer requires employees to use NIOSH approved dust mask respirators but there is no written respiratory protection program in place with procedures covering respirator selection, proper use of respirators, medical evaluation, fit tests, training, respirator cleaning and storage. | 1910.134(c);  1910.134(c)(1);  1910.134(c)(1)(i) thru (ix) | Because the respirators are required, the facility will need to develop a written respirator protection program and implement procedures that meet all of the requirements of the standard. | 02/2017 | Scott/James |
| Excel Industries | The facility requires mandatory use of respirators in the powder paint booth and touchup paint booth. There is a written respiratory protection program, however, not all provisions required in the written program are mentioned including: fit testing procedures, procedures for proper use in routine situations, procedures for cleaning, disinfecting, storing, inspecting, repairing, discarding respirators, procedures to ensure adequate air quality, quantity, and flow of breathing air for atmosphere-supplying respirators, employee training, procedures for program evaluation, and designation of program administrator. | 1910.134(c);  1910.134(c)(1);  1910.134(c)(1)(i) thru (ix) | Update current written respiratory program to mention all provisions mentioned in standard 1910.134. | 12-2-19 | Curtis |
| Global Parts | There is mandatory use of a half-face elastomeric respirator in the spray booth, but there is no written respiratory protection program in place with procedures covering respirator selection, proper use of respirators, medical evaluation, fit tests, training, respirator cleaning and storage. | 1910.134(c);  1910.134(c)(1);  1910.134(c)(1)(i) thru (ix) | Because half-face elastomeric respirators are being used, the facility will need to develop a written respirator protection program and implement procedures that meet all of the requirements of the standard. Due to the type of respirator, a written program is required whether the use is mandatory or voluntary. | 8-19-21 | Curtis |
| Atlas Aerospace | A written respiratory protection program is mandatory if employees wear an elastomeric respirator voluntarily. The written program must contain elements addressing medical evaluation, cleaning, disinfecting, storage and maintenance. | 1910.134(c)(2) | The facility will need to develop a written respirator protection program and implement procedures that meet all of the requirements of the standard. | 5-9-18 | Curtis Leiker |
| Atlas Aerospace | Spot check of one employee wearing respirator voluntarily showed no evidence at time of audit of being medically cleared to wear half-face elastomeric respirator. | 1910.134(c)(2)(ii) | Ensure all employees who wear an elastomeric half-face respirator are medically able to wear the respirator. | 5-9-18 | Curtis Leiker |
| Triumph – KC | The facility has provided NIOSH approved P-95 dust mask respirators to employees to use on a voluntary basis (Photo 3). Documentation was not available that the employer has provided employees with the information included in Appendix D of the OSHA respiratory protection standard. In addition, all employees that use a dust mask respirator (P-95) must be medically cleared to wear the respirator. | 1910.134(c)(2)(i);  1910.134(c)(2)(ii) | Provide employees using dust mask respirators (P-95) with the information in 29 CFR 1910.134 Appendix D (Information for Employees Using Respirators When Not Required Under the Standard). A copy of this information is included as Appendix E of this report. Documentation of receipt of the information should be maintained in the employee’s Human Resources file. Ensure that all employees using dust mask respirators (P-95) are medically cleared to wear those respirators. | 03/2017 | Scott |
| NPC Valley Center | The facility has provided NIOSH approved P-95 dust mask respirators to employees to use on a voluntary basis. One employee was observed wearing a P-95 dust mask. Documentation was not available that the employer has provided this employee with the information included in Appendix D of the OSHA respiratory protection standard. In addition, all employees that use an elastomeric dust mask respirator (P-95) must be medically cleared to wear the respirator. | 1910.134(c)(2)(i);  1910.134(c)(2)(ii) | Provide employees using dust mask respirators (P-95) with the information in 29 CFR 1910.134 Appendix D (Information for Employees Using Respirators When Not Required Under the Standard). Documentation of receipt of the information should be maintained in the employee’s Human Resources file. Ensure that all employees using elastomeric dust mask respirators (P-95) are medically cleared to wear those respirators. | 10-9-18 | Curtis Leiker  Scott Smith |
| Hillsboro Industries | The facility provides respirators to employees to use on a voluntary basis. Documentation was not available that the employer has provided employees with the information included in Appendix D of the OSHA respiratory protection standard. | 1910.134(c)(2)(i);  1910.134(c)(2)(ii) | Provide employees using voluntary respirators with the information in 29 CFR 1910.134 Appendix D (Information for Employees Using Respirators When Not Required Under the Standard). Documentation of receipt of the information should be maintained in the employee’s medical file. | 5-23-18 | Curtis Leiker |
| Kansas Ethanol | The facility provides respirators to employees to use on a voluntary basis. Documentation was not available that the employer has provided employees with the information included in Appendix D of the OSHA respiratory protection standard. | 1910.134(c)(2)(i);  1910.134(c)(2)(ii) | Provide employees using voluntary respirators with the information in 29 CFR 1910.134 Appendix D (Information for Employees Using Respirators When Not Required Under the Standard). Documentation of receipt of the information should be maintained in the employee’s medical file. | 11-7-18 | Curtis Leiker |
| Perfekta | The facility provides filtering facepiece respirators to employees to use on a voluntary basis. Documentation was not available that the employer has provided employees with the information included in Appendix D of the OSHA respiratory protection standard. | 1910.134(c)(2)(i);  1910.134(c)(2)(ii) | Provide employees using voluntary respirators with the information in 29 CFR 1910.134 Appendix D (Information for Employees Using Respirators When Not Required Under the Standard). Documentation of receipt of the information should be maintained in the employee’s medical file. | 8-16-19 | Curtis |
| MPM | The facility provides half-face elastomeric respirators (See Photos 23, 24) to employees to use on a voluntary basis. Documentation was not available that the employer has provided employees with the information included in Appendix D of the OSHA respiratory protection standard. | 1910.134(c)(2)(i);  1910.134(c)(2)(ii) | Provide employees using voluntary respirators with the information in 29 CFR 1910.134 Appendix D (Information for Employees Using Respirators When Not Required Under the Standard). Documentation of receipt of the information should be maintained in the employee’s medical file. See Appendix D. | 8-23-21 | Curtis |
| MPM | There is voluntary use of half-face elastomeric respirators in the Assembly area, but there is no written respiratory protection program in place with procedures covering respirator selection, proper use of respirators, medical evaluation, fit tests, training, respirator cleaning and storage. | 1910.134(c)(2)(ii)  1910.134(c)(1)(i) thru (ix) | Because half-face elastomeric respirators are being used, the facility will need to develop a written respirator protection program and implement procedures that meet all of the requirements of the standard. Due to the type of respirator, a written program is required whether the use is mandatory or voluntary. | 8-23-21 | Curtis |
| MPM | There is voluntary use of half-face elastomeric respirators in the Assembly area, but there are no medical evaluations done on employees prior to usage to validate employees are medically able to use a respirator. | 1910.134(c)(2)(ii)  1910.134(e) | Establish initial medical evaluation procedures for all employees who are wearing the elastomeric respirators so that they are evaluated by a licensed health care professional prior usage. | 8-23-21 | Curtis |
| Global Parts | There is voluntary use of half-face elastomeric respirators in the spray booth, but at the time of the audit there was no evidence of medical evaluations done on employees prior to usage to validate employees are medically able to use a respirator. | 1910.134(c)(2)(ii)  1910.134(e) | Establish initial medical evaluation procedures for all employees who are wearing the elastomeric respirators so that they are evaluated by a licensed health care professional prior usage. | 8-19-21 | Curtis |
| Global Parts | Employee wearing half-face elastomeric respiratory for spray booth stated he changes out the organic vapor cartridges once every 2-3 months, but changes out the P95 particulate filter on a more frequent basis. | 1910.134(d)(3)(iii)(B) | Implement a formal change out schedule for the organic vapor cartridges and particulate filters that does not exceed the protection before the end of the service life. Industrial hygiene sampling needs to be completed to establish the schedule. | 8-19-21 | Curtis |
| Perfekta | A spot check of one employee required to use a respirator showed that he did not receive medical clearance prior to their job assignment with respirators. The employer shall provide a medical evaluation to determine the employee's ability to use a respirator, before the employee is fit tested or required to use the respirator in the workplace. | 1910.134(e) | Establish initial medical evaluation procedures for all employees who are required to wear a respirator so that they are evaluated by a licensed health care professional prior to a job assignment with respirators. | 02/2017 | Scott |
| Perfekta | A spot check of one employee using respirators showed that the employee has received a respirator fit test within the last year. Employees using respirators must be fit tested annually with the same make, model, style, and size of respirator that will be used. | 1910.134(f) | Establish annual fit testing program, including documentation, for all employees who are required to wear a respirator. | 02/2017 | Scott |
| FACC | A spot check of two employees required to use a respirator showed that documentation was not available to show that both of the employees had received a respirator fit test or training within the last year. Both employees were last fit tested in March, 2015. Employees using respirators must be fit tested annually with the same make, model, style, and size of respirator that will be used. | 1910.134(f);  1910.134(k)(3);  1910.134(k)(5) | Establish an annual fit testing program, including documentation, for all employees who are required to wear a respirator. | 04/2016 | Scott |
| Electromech | A spot check of three employees required to use a respirator showed that documentation was not available to show that two of the three employees had received a respirator fit test or training within the last year. Employees using respirators must be fit tested annually with the same make, model, style, and size of respirator that will be used. Training is also required prior to assignment and annually. | 1910.134(f);  1910.134(k)(3);  1910.134(k)(5) | Ensure that all employees who use respirators are trained adequately prior to their initial job assignment and annually thereafter. All training should be documented. Establish an annual fit testing and training program, including documentation, for all employees who are required to wear a respirator. | 11/2015 | Scott |
| Global Parts | Employees who are required to wear a half-face elastomeric respirator are not being fit tested. | 1910.134(f) | Establish annual fit testing program, including documentation, for all employees who are required to wear a respirator. Employees using respirators must be fit tested initially and annually with the same make, model, style, and size of respirator that will be used. | 8-19-21 | Curtis |
| Perfekta | A spot check of one employee required to use a respirator showed that documentation was not available to show that the employees had received respirator training within the last year. Employees using respirators must be trained prior to assignment and then annually thereafter. | 1910.134(k)(3);  1910.134(k)(5) | Ensure that all employees who use respirators are trained adequately prior to their initial job assignment and annually thereafter. All training should be documented. | 02/2017 | Scott |
| Electromech | One employee with facial hair that might interfere with the sealing surface of a respirator is allowed to wear a half-mask respirator. Respirator wearers must be clean shaven wherever the respirator sealing surface touches the skin. | 1910.134(g)(1)(i);  1910.134(g)(1)(i)(A)  10/11/84 OSHA Letter of Interpretation | Supervisors should be responsible to ensure that all employees required to wear respirators are clean shaven where the sealing surface of the respirator touches the skin. Consider disciplinary action and/or stocking shaving cream and razors on site and require employees to shave if necessary. | 11/2015 | Scott |
| ElDorado | An employee was observed using a respirator caked with undercoating material (Photo 7). There is no evidence that exposure conditions are evaluated to determine respirator effectiveness. | 1910.134(g)(2)(i) thru (iii);  1910.134(h)(2)(i) | The employer is required to maintain surveillance of work area conditions and degree of employee exposure. When there is a change in work area conditions or degree of employee exposure that may affect respirator effectiveness, the employer shall reevaluate the continued effectiveness of the respirator. | 10/2013 | Scott |
| MPM | Employees who use a half-face elastomeric respirator in Assembly are not cleaning and disinfecting their respirator on a regular basis to ensure they are being maintained in a sanitary condition. Employee stated he is not cleaning his respirator at all and would just buy new. | 1910.134(h)(1) | Ensure respirators are cleaned AND disinfected on regular intervals:   * If each employee has their own respirator, as often as necessary to be maintained in a sanitary condition. * If issued to more than one employees, each time worn by a different person.   If the employee is using daily, the respirator should be cleaned AND disinfected at least weekly. | 8-23-21 | Curtis |
| Global Parts | Employees who use a half-face elastomeric respirator in the spray booth are not cleaning and disinfecting their respirator on a regular basis to ensure they are being maintained in a sanitary condition. Employee stated he is not cleaning his respirator at all. | 1910.134(h)(1) | Develop the written respiratory protection program and ensure respirators are cleaned AND disinfected on regular intervals:   * If each employee has their own respirator, as often as necessary to be maintained in a sanitary condition. * If issued to more than one employees, each time worn by a different person.   If the employee is using daily, the respirator should be cleaned AND disinfected at least weekly. | 8-19-21 | Curtis |
| Electromech | An employee respirator is not being stored properly when not in use (Photo 19). All respirators shall be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals, and they shall be packed or stored to prevent deformation of the face piece and exhalation valve. | 1910.134(h)(2);  1910.134(h)(2)(i) | Provide storage bags or containers and ensure that employees properly store their respirators when not in use. | 11/2015 | Scott |
| Vermillion | An employee respirator is not being stored properly when not in use (see Photo 2505). All respirators shall be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals, and they shall be packed or stored to prevent deformation of the face piece and exhalation valve. | 1910.134(h)(2);  1910.134(h)(2)(i) | Provide storage bags or containers and ensure that employees properly store their respirators when not in use. | 7-23-18 | Curtis |
| Kansas Ethanol | An employee respirator is not being stored properly when not in use (see Photo 2876). All respirators shall be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals, and they shall be packed or stored to prevent deformation of the face piece and exhalation valve. | 1910.134(h)(2);  1910.134(h)(2)(i) | Provide storage bags or containers and ensure that employees properly store their respirators when not in use. Since filtering facepiece respirators are disposable, it may be best to just discard after use. | 11-7-18 | Curtis |
| Boss Tank | A paint hood was observed with a tear in the outer protective cover (Photo 12). | 1910.134(h)(2)(i);  1910.134(h)(3)(i)(A);  1910.134(h)(4) | Remove the respirator hood from service. | 02/2013 | Scott |
| iSi Lulu | The Self-Contained Breathing Apparatus (SCBA) respirators and bottles are not being inspected on a monthly basis as required. | 1910.134(h)(3)(iii);  1910.134(h)(3)(iv);  1910.134(h)(3)(iv)(A);  1910.134(h)(3)(iv)(B); | Begin inspecting all SCBA respirators monthly. Send documentation to Ben Chavez. | 10/2012 | Scott / Ben |
| Kuhn | There is no evidence that the compressed breathing air supplying the respirators being used by the painters meets the requirements for Grade D breathing air. | 1910.134(i)(1)(ii);  1910.134(i)(1)(ii)(A) thru (E) | Have the breathing air tested for oxygen content, particulates, hydrocarbon content, carbon monoxide content, carbon dioxide content and any noticeable odor. Documentation must be provided indicating Grade D breathing air compliance. | 03/2016 | Scott |
| Excel Industries | There is no evidence that the compressed breathing air supplying the respirators being used by the painters meets the requirements for Grade D breathing air. | 1910.134(i)(1)(ii);  1910.134(i)(1)(ii)(A) thru (E) | Have the breathing air tested for oxygen content, particulates, hydrocarbon content, carbon monoxide content, carbon dioxide content and any noticeable odor. Documentation must be provided indicating Grade D breathing air compliance. iSi recommends completing Grade D breathing air analysis on an annual basis. | 12-2-19 | Curtis |
| APR | The air intake for the compressed breathing air compressor is located in the garage area and is subject to paint vapors and auto exhaust. | 1910.134(i)(5)(i) | The air compressor intake should be routed to pull in clean air from outside the building. | 12/2012 | Scott |
| Paragon | The air compressors that supply breathing air to the painters do not have equipment installed to:  a. Prevent entry of contaminated air into the air-supply system;  b. Minimize moisture content;  c. Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions;  d. Have a tag containing the most recent change date and the signature of the person authorized by the employer to perform the change. The tag shall be maintained at the compressor. This equipment is required for all air compressors providing breathing air regardless of whether the compressor is oil lubricated. | 1910.134(i)(5)(i) thru (iv) | Purchase an add-on clean air breathing box filtration system to provide the necessary regulatory requirements for the compressed air systems. |  |  |
| Kice | There is no evidence that the breathing air compressor used for the bead blaster has the required equipment to a) minimize the moisture content of the breathing air; b) provide additional sorbent bed in-line purifying; c) monitor carbon monoxide levels; and, d) provide a warning for high carbon monoxide levels. An inspection tag is also required at the compressor indicating filter change history. | 1910.134(i)(5)(ii) thru (iv);  1910.134(i)(6) thru (7) | Purchase an add-on clean air breathing box filtration system to provide the necessary regulatory requirements for the compressed air system. If the system alarms, the bead blasters must be made aware of the alarm either by an audible alarm or visible alarm such as strobe lights. | 03/2017 | Scott |
| Kuhn | There is no evidence that the air compressor used to supply breathing air for the painters has a carbon monoxide alarm. For oil-lubricated compressors, the employer shall use a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply shall be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 parts per million (ppm). | 1910.134(i)(7) | Install a carbon monoxide alarm on the breathing air system to provide the necessary regulatory requirements for the compressed air system. Instruct employees on what to do if the alarm sounds. | 03/2016 | Scott |
| Kice | The couplings for the supplied air respirator lines used in the bead blaster area are the same as the ones used for air powered tools. All breathing air couplings must be incompatible with outlets used for non-respirable worksite air or other gas systems. | 1910.134(i)(8) | Replace the couplings on the breathing air lines with incompatible ones that cannot be hooked up to other systems. | 03/2017 | Scott |
| Global Parts | Employees using mandatory half-face elastomeric respirators are not being trained initially or annually. | 1910.134(k);  1910.134(k)(3);  1910.134(k)(5) | Ensure that all employees who use mandatory respirators are trained adequately prior to their initial job assignment and annually thereafter. All training should be documented. | 8-19-21 | Curtis |
| ElDorado – KS | A spot check of employees using respirators showed that employees have not received annual respiratory training. Employees must be trained initially before job assignment and then annually thereafter. | 1910.134(k)(3);  1910.134(k)(5) | Ensure that all employees who use respirators are trained adequately prior to their initial job assignment and annually thereafter. All training should be documented. | 10/2014 | Scott |
| Kice Industries | Review of respirator fit testing records from Cintas indicated that the records did not indicate the specific model of respirator. | 1910.134(m)(2)(i)(C) | Ensure Cintas is fully documenting the specific information on the respirators including the model. | 5-16-18 | Curtis Leiker |
| Kansas Ethanol | A visitor hard hat was in use with manufactured date of 2008 (see Photo 2). OSHA relies on ANSI standard Z89.1 for compliance which then refers to the manufacturer’s instructions regarding service life. MSA’s instruction manual states suspensions should be replaced after 12 months of use and shells replaced after no more than five years of use. | 1910.135(b)(1)  ANSI Z89.1-2009 | Replace all hard hat shells more than five years old and ensure suspensions are being replaced after one year of use. | 6-26-19 | Curtis Leiker |
| Perfekta | A hard hat was in use with manufactured date of 2010. OSHA relies on ANSI standard Z89.1 for compliance which then refers to the manufacturer’s instructions regarding service life. MSA’s instruction manual states suspensions should be replaced after 12 months of use and shells replaced after no more than five years of use. | 1910.135(b)(1)  ANSI Z89.1-2009 | Replace all hard hat shells more than five years old and ensure suspensions are being replaced after one year of use. | 8/16/19 | Curtis |
| Triumph – KC | Employees are working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, or when the use of protective footwear will protect the affected employee from an electrical hazard. | 1910.136(a) | Implement a protective footwear policy for the entire facility. | 03/2017 | Scott |
| Atlas Aerospace | Employees are working in areas where there is a danger of foot injuries due to falling or rolling objects. Employees are exposed to numerous rolling objects (powered industrial trucks) and heavy parts which would fall on feet. | 1910.136(a) | Implement a protective footwear policy for the entire facility. | 5-9-18 | Curtis Leiker |
| Kice Industries | Employees are working in areas where there is a danger of foot injuries due to falling or rolling objects. Employees are exposed to numerous rolling objects (powered industrial trucks) and heavy parts which would fall on feet. | 1910.136(a) | Implement a protective footwear policy for the entire facility. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | Employees are working in areas where there is a danger of foot injuries due to falling or rolling objects. Employees are exposed to numerous rolling objects (powered industrial trucks) and heavy parts which would fall on feet. Observed employee in Aluminum Truck Bed who dropped metal part and quickly moved to avoid harming foot. | 1910.136(a) | Implement a protective footwear policy for the entire facility. | 5-23-18 | Curtis Leiker |
| MPM | Employees are working in areas where there is a danger of foot injuries due to falling or rolling objects including forklifts and 50 pound metal doors (See Photo 25). | 1910.136(a) | Implement a protective footwear policy for the entire facility as applicable. | 8-23-21 | Curtis |
| Pet-Ag | Currently, only forklift drivers are required to wear protective footwear for falling or rolling objects. The policy does not include other employees also working in these areas. | 1910.136(a) | Expand the protective footwear policy for the entire facility as applicable to all employees who are exposed to falling or rolling objects. | 9-14-21 | Curtis |
| ATC | Numerous instances were observed where the employee’s hands were not adequately protected from hazards. A Closed Mold employee dipped his hand in acetone to clean it off which can lead to long term dermatitis. Employees work with MEK without any chemical protective gloves. MEK is absorbed through the skin and can cause systemic effects. Employees use box knives and kitchen knives without cut resistant hand protection. (Photo 20) | 1910.138 (a) & (b) | Discontinue using chemicals to wash hands.  Provide appropriate hand protection for the hazards. | 10/2014 | James |
| Perfekta | The facility uses body belts as personal fall arrest protection for employees working in scissor lifts (Photo 14). Body belts are used for positioning work only and the use of body belts for fall protection has been prohibited by OSHA since 1998. | 1910.140(d)(3) | Cut the existing body belts in half and discard them. Fall protection is not required in scissor lists but if required by company policy, ensure that employees use a full body harness with a lanyard (See Example Photo 1). | 02/2017 | Scott |
| **Subpart J – General Environmental Controls** | | | | | |
| Harlow | Metal dust is allowed to collect on the floor and on the machines (Photos 8, 9). | 1910.141(a)(4)(ii) | Ensure that all dust is swept or vacuumed with a unit that has HEPA filtration when the job is finished. | 08/2012 | Scott / Keith |
| Harlow | Sawdust from the crate building operation is allowed to collect on the floor and on the table. This can potentially cause flash fires or explosions (Photo 10). | 1910.141(a)(4)(ii) | Ensure that all dust is swept or vacuumed with a unit that has HEPA filtration when the job is finished. | 08/2012 | Scott / Keith |
| Learjet – Tucson, AZ | (a) Building J: The employer had provided a water cooler for the employees, however the employer did not provide disposable drinking cups. | 1910.141(b)(1)(vi) | Drinking water was dispensed into a common drinking cup or other common utensil. | 2020 | ADOSH |
| Mid Continent | It appears that employees are consuming food and beverages in areas where hazardous chemicals are used (Photos 16, 17, 18). | 1910.141(g)(2);  1910.141(g)(4) | Require all employees to use the break areas to consume food and beverages. | 06/2014 | Scott |
| USD 259 | It appears that employees are consuming food and beverages in areas where hazardous chemicals are used (Photo 26). | 1910.141(g)(2);  1910.141(g)(4) | Require all employees to use the break areas to consume food and beverages. | 7-30-2018 | Scott Smith |
| MPM | It appears that employees are consuming food and beverages in areas where hazardous chemicals are used (See Photo 26). | 1910.141(g)(2);  1910.141(g)(4) | Require all employees to use the break areas to consume food and beverages. | 8-23-21 | Curtis |
| NPC | Open drink containers were found in an area with carbon black dust present (See Photo 6). CDC guidance states adverse health effects may occur with ingestion of carbon black. | 1910.141(g)(2);  1910.141(g)(4) | Recommend prohibiting drink containers in this area that are not able to be fully closed and thus prevent the dust from entering the drink. | 6-22-22 | Curtis |
| Hillsboro Industries | Bag of powdered mix drink found in flammable chemical storage cabinet (see Photo 4247). | 1910.141(g)(4) | Prohibit storage of food and drink products in areas where hazardous chemicals are used or stored. Require all employees to use the break areas to consume food and beverages. | 7-10-2019 | Curtis |
| Faultless | **Moderate** – A refrigerator in the lab break room was being used for both chemicals and food storage (Photos 9, 10). | 1910.141(g)(4) | Remove all food and drink from chemical refrigerators and label them as “No Food or Drink Allowed.” | 02/2015 | Scott |
| XLT Ovens | There is no evidence that employees have been trained on the specifications for accident prevention signs and tags. | 1910.145(c)(1)(ii);  1910.145(c)(2)(ii)’  1910.145(f)(4)(v) | Training is required initially, or prior to working in areas where signage is used. All employees shall be informed as to the meaning of the various signs such as danger and caution signs used throughout the workplace and what special precautions are necessary. | 11/2013 | Scott |
| Excel Industries | There is no evidence that employees have been trained on the specifications for accident prevention signs and tags. | 1910.145(c)(1)(ii);  1910.145(c)(2)(ii);  1910.145(f)(4)(v) | Training is required initially, or prior to working in areas where signage is used. All employees shall be informed as to the meaning of the various signs such as danger and caution signs used throughout the workplace and what special precautions are necessary. | 12-2-19 | Curtis |
| Global Parts | There is no evidence that employees have been instructed on the specifications for accident prevention signs and tags, such as caution and danger tape and wet floor signs. | 1910.145(c)(1)(ii);  1910.145(c)(2)(ii);  1910.145(f)(4)(v) | Instruction is required initially prior to working in areas where signage is used. All employees shall be informed as to the meaning of the various signs such as danger and caution signs used throughout the workplace and what special precautions are necessary. Add into new hire orientation or post information on employee bulletin boards. | 8-19-21 | Curtis |
| NPC | There were no “wet floor” signs posted by Line 3 where several instances of water on the floor were present to employees causing a potential slip hazard to employees. | 1910.145(c)(2)(i) | Ensure “wet floor” signs are readily available for employees to use and are posted when wet floor conditions are present. | 2-7-19 | Curtis Leiker |
| NPC | The material grinder hoppers (Examples: Photos 3, 4) meet the OSHA definition of a permit-required confined space due to the potential for an employee to be trapped by inwardly converging walls. | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) | A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted on the hoppers to inform exposed employees. Consider using self-adhesive signs similar to Grainger Part Number 1VC65 or suitable equivalent. | 07/2014 | Scott |
| Kuhn | The facility lists three non-permit confined spaces in their Confined Space Program. All three of these meet the definition of a permit-required confined space in that they contain or have a potential to contain a hazardous atmosphere. In addition, facility personnel indicated that the confined spaces are not labeled. | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) | Revise the written Confined Space Program to classify these confined spaces as permit-required confined spaces. Label the confined spaces appropriately. A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted on confined spaces. | 03/2016 | Scott |
| CNH – Grand Island | The trash compactor is not labeled as a permit-required confined space (Photo 4625). OSHA considers the trash compactors as permit-required confined spaces. | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2);  Appendix E: 01/27/12 Wal-Mart Citation | A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted on the hoppers to inform exposed employees. Consider using self-adhesive signs similar to Grainger Part Number 1VC65 or suitable equivalent. | 04/2017 | Scott |
| El Dorado Manufacturing Facility (EMF) | The trash compactors are not labeled as permit-required confined spaces (see Photo 5). OSHA considers the trash compactors as permit-required confined spaces. | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) |  | 4-23-18 | Scott Smith |
| USD 259 | The tunnel running to the other side of the building (Photo 27) meets the OSHA definition of a permit-required confined space since it contains a potential to contain a hazardous atmosphere or serious safety or health hazard (steam pipes). | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) | A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted at the entrance on both sides of the building. Employees should not enter the space unless the facility confined space procedures are followed. | 7-30-18 | Scott Smith |
| Kice | The compressed air tanks are not labeled as permit-required confined spaces (see Photo 3533). | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) | A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted at the entrance portals. | 5-14-19 | Curtis |
| NPC  Valley Center | The dust collectors in Line 12 Warehouse (see Photo 5) meet the OSHA definition of a permit-required confined space due to the potential for an employee to be trapped by inwardly converging walls. | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) | A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted on the hoppers to inform exposed employees. | 8-26-20 | Curtis |
| MPM | The scrap metal chip compactor contains a hazardous space and is approximately 5 feet deep, which is restricted access into the space, but is not labeled as permit-required confined space. | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) | A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted at the entrance of the compactor space. | 8-23-21 | Curtis |
| Pet-Ag | The dust collector in Production (See Photo 8) and the storm water drainage system outside (See Photo 9) meet the definition of a confined space and contains a hazardous space but is not labeled as permit-required confined space. | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) | A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted at the entrance of the dust collector space and storm water drainage system entry points. | 9-14-21 | Curtis |
| NPC | The wastewater pit is greater than 4 feet deep, has an engulfment hazard, and thus meets the definition of a permit-required confined space but is not labeled as permit-required confined space (See Photo 10). | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) | A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted at the entrance of the space. | 6-22-22 | Curtis |
| NPC | The wastewater pit is greater than 4 feet deep, has an engulfment hazard, and thus meets the definition of a permit-required confined space but is not labeled as permit-required confined space (See Photo 7). | 1910.146(b);  1910.146(c)(1);  1910.146(c)(2) | A sign reading DANGER -- PERMIT-REQUIRED CONFINED SPACE, DO NOT ENTER or using other similar language should be posted at the entrance of the space. | 6-22-22 | Curtis |
| Kansas Ethanol | Confined space signs on south side of equipment are becoming worn and illegible (see Photo 3). | 1910.146(c)(2) | Attach a new “DANGER – PERMIT REQUIRED COFINED SPACE” sign. | 6-26-19 | Curtis Leiker |
| PBI Gordon – KC | Maintenance employees indicated that they enter confined spaces without a written confined space permit and without a tank attendant. | 1910.146(c)(4) | Confined space entry should not be allowed unless the written procedures are followed. | 05/2013 | Scott |
| Harlow | For confined space entries, it appears that the facility does not perform an internal atmosphere test for oxygen content, flammable gases and vapors, and for potential toxic air contaminants, in that order. | 1910.146(c)(5)(ii)(C) | Purchase or rent a multi-gas meter and begin testing all confined spaces prior to entry and document entry conditions. | 08/2012 | Scott / Keith |
| U.S. Ambulance | **Moderate** – The four gas meter that is being used when contractors enter confined spaces has not been properly calibrated since 2013. | 1910.146(c)(5)(ii)(C) | Purchase a cylinder of four mixture calibration gas and ensure that the meter is calibrated per the manufacturer’s recommendation and procedure prior to being used for continuous monitoring of confined spaces. An alternative would be to have an outside contractor calibrate the unit prior to each use. | 04/2015 | Scott |
| Harlow | There is no evidence that ventilating equipment is available to obtain acceptable entry conditions for confined spaces. | 1910.146(d)(3)(iv);  1910.146(d)(4)(ii) | Purchase or rent acceptable ventilation equipment for use in all confined space entries. | 08/2012 | Scott / Keith |
| Pet-Ag | The facility is not currently reviewing canceled confined space entry permits within one year after entry. | 1910.146(d)(14) | Implement a formal review procedure for canceled confined space permit and retain documentation of such review. | 05/2022 | Curtis |
| Harlow | There is no evidence that confined space attendant training has been conducted. | 1910.146(g)(1);  1910.146(i)(1) thru (i)(10) | Conduct confined space attendant training for all affected personnel. | 08/2012 | Scott / Keith |
| Kuhn | There is no evidence that employees with permit-required confined space duties have been trained. Employees must be trained initially and then when an employee’s duties change, when hazards in the space change, when there are deviations from the permit space entry procedures, and when the employee’s knowledge of entry procedures are inadequate. | 1910.146(g)(1);  1910.146(2)(i) thru (iv) | Conduct and document confined space training for all affected personnel. | 03/2016 | Scott |
| Facility | There is no evidence that employees with permit-required confined space duties have been trained. Employees must be trained initially and then when an employee’s duties change, when hazards in the space change, when there are deviations from the permit space entry procedures, and when the employee’s knowledge of entry procedures are inadequate. | 1910.146(g)(1);  1910.146(2)(i) thru (iv) | Conduct and document confined space training for all affected personnel. | 7-30-2018 | Scott Smith |
| Kuhn | The facility provides a confined space rescue team. There is no evidence that affected employees are trained to perform assigned rescue duties. Also, there is no evidence that affected employees practice making permit space rescues at least once every 12 months, by means of simulated rescue operations in which they remove dummies, manikins, or actual persons from the actual permit spaces or from representative permit spaces. | 1910.146(k)(2)(i);  1910.146(k)(2)(iv) | Train all members of the confined space rescue team on rescue procedures including a practice rescue to be conducted at least once every 12 months. | 03/2016 | Scott |
| Carlson | There is no lockout/tagout (LOTO) program in place to prevent exposure to employees from the unexpected energization, start up, or release of stored energy. | 1910.147(a)(3)(i) | Need to develop a LOTO program and train employees accordingly. | 06/2012 | Scott |
| E-One | **Moderate** – The Strip-It CNC machine was observed with just a tag instead of the required lock and tag. The operator indicated that this is a common practice. If an energy isolating device is capable of being locked out, then a lock and tag will be utilized. | 1910.147(c)(2)(ii) | Ensure that all LOTO authorized employees are trained to install a lock and a tag for all LOTO operations. See Section 4.1.1 and 4.1.2 of the E-ONE Safety Policy SP-205. | 04/2015 | Scott |
| Mid Continent | A lock was in place on an active LOTO job without an accompanying tag (Photo 21). The tagout device shall be attached at the same location that the lockout device. | 1910.147(c)(3)(i) | Place a tag along with the lock on all active LOTO job functions. Consider a periodic inspection to monitor active LOTO jobs. | 06/2014 | Scott |
| Atlas Aerospace | There was no evidence that machine specific lockout procedures are in place for required machines. These detailed procedures are required for machines that have more than one source of hazardous energy, such as electrical and pneumatic. | 1910.147(c)(4)(i) | Need to survey the facility and determine which machines meet the requirements for machine specific lockout procedures according to the OSHA standard. Need to develop a lockout procedure for each machine that is identified. An example machine specific lockout procedure for a CNC machine is included in Appendix F. | 06/2016 | Scott |
| Atlas Aerospace | There was no evidence that machine specific lockout procedures are in place for required machines. These detailed procedures are required for machines that have more than one source of hazardous energy, such as electrical and pneumatic | 1910.147(c)(4)(i) | Need to survey the facility and determine which machines meet the requirements for machine specific lockout procedures according to the OSHA standard. Need to develop a lockout procedure for each machine that is identified | 5-9-18 | Curtis Leiker |
| Perfekta | There was no evidence that machine specific lockout procedures are in place for required machines. These detailed procedures are required for machines that have more than one source of hazardous energy, such as electrical and pneumatic. | 1910.147(c)(4)(i) | Need to survey the facility and determine which machines meet the requirements for machine specific lockout procedures according to the OSHA standard. Need to develop a written machine specific lockout procedure for each machine that is identified. | 8/16/19 | Curtis |
| MPM | There was no evidence that machine specific lockout / tagout (LOTO) procedures are in place for required machines. These detailed procedures are required for machines that have more than one source of hazardous energy, such as electrical and pneumatic. | 1910.147(c)(4)(i) | Need to survey the facility and determine which machines meet the requirements for machine specific lockout procedures according to the OSHA standard. Need to develop a written machine specific lockout procedure for each machine that is identified. If using pre-populated procedures is not desirable and LOTO is performed infrequently, a permit system is allowed by OSHA. See Appendix E. | 8-23-21 | Curtis |
| NPC | The facility is using ordinary Master locks for their LOTO. | 1910.147(c)(5)(ii)(B) | The standard states that locks need to be standardized within the facility. While the Goddard facility is obviously a separate facility from the Valley Center facility, they should be under the same color-coded lock management system in place at the Valley Center facility. | 09/2012 | Scott / Ben |
| NPC | A lock was placed on equipment in the Line 7 area that had the name of an employee that is no longer employed with NPC. | 1910.147(c)(5)(ii)(D) | Ensure that all lockout devices identify the employee applying the device. | 09/2012 | Scott / Ben |
| Kansas Ethanol | Numerous lockout locks were observed on electrical equipment not related to servicing or maintenance of machines (see Photo 2880), including electrical disconnects that are out of service. | 1910.147(c)(5)(ii)  Letter of Interpretation 10-11-06 | Ensure all lockout locks that are used for “out of service” status are replaced with other locks that are not within the lockout tagout program. | 11-7-18 | Curtis |
| Global Parts | A lockout/tagout (LOTO) lock was placed on equipment that had no identification of whom placed the lock (See Photo 8). | 1910.147(c)(5)(ii)(D) | Ensure that all lockout devices identify the employee applying the device. | 8-19-21 | Curtis |
| Kice | There is no evidence that an annual audit is being performed on each existing machine specific energy control procedure. | 1910.147(c)(6)(i);  1910.147(c)(6)(i)(A) thru (D);  1910.147(c)(6)(ii) | Have an authorized individual (other than an employee that is using the lockout/tagout procedure) perform an audit of each lockout procedure performed during the year and document the audit. | 03/2017 | Scott |
| Kice | There is no evidence that an annual audit is being performed on each existing machine specific energy control procedure. | 1910.147(c)(6)(i);  1910.147(c)(6)(i)(A) thru (D);  1910.147(c)(6)(ii) | Have an authorized individual (other than an employee that is using the lockout/tagout procedure) perform an audit of each lockout procedure performed during the year and document the audit. | 5-18-18 | Curtis Leiker |
| Atlas Aerospace | There is no evidence that an annual audit is being performed on each existing machine specific energy control procedure. | 1910.147(c)(6)(i);  1910.147(c)(6)(i)(A) thru (D);  1910.147(c)(6)(ii) | Have an authorized individual (other than an employee that is using the lockout/tagout procedure) perform an audit of each lockout procedure performed during the year and document the audit. | 5-9-18 | Curtis Leiker |
| MPM | There is no evidence that an annual audit is being performed on each existing machine specific energy control procedure. | 1910.147(c)(6)(i);  1910.147(c)(6)(i)(A) thru (D);  1910.147(c)(6)(ii) | Once the machine specific LOTO procedures are developed, have an authorized individual (other than an employee that is using the LOTO procedure) perform an audit of each lockout procedure performed during the year and document the audit. This requirement may be accomplished on a permit system as well. | 8-23-21 | Curtis |
| Electromech | There is no evidence that authorized employees (Employees who lock out or tag out [LOTO] machines or equipment in order to perform servicing or maintenance on that machine or equipment) are trained in LOTO procedures. | 1910.147(c)(7)(i);  1910.147(c)(7)(i)(A);  1910.147(c)(7)(iii)(A) | Each authorized employee shall receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control. Training is required before job assignment and whenever there is a change in their job assignments, a change in equipment which presents a new hazard, or when there is a change in the energy control procedures. | 11/2015 | Scott |
| MPM | There is no evidence that authorized employees (employees who lockout or tagout machines or equipment in order to perform servicing or maintenance on that machine or equipment) are trained in LOTO procedures. | 1910.147(c)(7)(i);  1910.147(c)(7)(i)(A);  1910.147(c)(7)(iii) | Each authorized employee shall receive training in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control. Training is required before job assignment and whenever there is a change in their job assignments, a change in equipment which presents a new hazard, or when there is a change in the energy control procedures. | 8-23-21 | Curtis |
| Electromech | There is no evidence that affected employees (Employees who operate or use a machine or equipment on which servicing or maintenance is being performed under LOTO) are trained in LOTO awareness. | 1910.147(c)(7)(i);  1910.147(c)(7)(i)(B);  1910.147(c)(7)(iii)(A) | Each affected employee shall be instructed in the purpose and use of the energy control procedure. Training is required before job assignment and whenever there is a change in their job assignments, a change in equipment which presents a new hazard, or when there is a change in the energy control procedures. | 11/2015 | Scott |
| MPM | There is no evidence that affected employees (employees who operate or use a machine or equipment on which servicing or maintenance is being performed under LOTO or work in the same area in which servicing or maintenance is being performed) are instructed in LOTO awareness. | 1910.147(c)(7)(i);  1910.147(c)(7)(i)(B);  1910.147(c)(7)(iii)(A) | Each affected employee shall be instructed in the purpose and use of the energy control procedure. Instruction is required before job assignment and whenever there is a change in their job assignments, a change in equipment which presents a new hazard, or when there is a change in the energy control procedures. | 8-23-21 | Curtis |
| NPC | LOTO training records were not available for one “authorized” and one “other” employee. | 1910.147(c)(7)(v);  NPC Lockout/Tagout program (page 2) | Ensure that all employees, including members of management, are trained initially and annually thereafter. | 09/2012 | Scott / Ben |
| **Subpart K – Medical and First Aid** | | | | | |
| NPC | None of the locations have employees trained in first aid and cardiopulmonary resuscitation (CPR). There is no evidence that outside trained emergency medical treatment personnel such as fire department paramedics or EMS responders are within 3 to 4 minutes of the facility to render first aid to injured employees per the OSHA standard. | 1910.151(b) | Train at least one employee per shift at each location in first aid and CPR. | 06/2017 | Scott |
| Ultra Clean | The facility does not have employees trained in first aid and cardiopulmonary resuscitation (CPR). There is no evidence that outside trained emergency medical treatment personnel such as fire department paramedics or EMS responders are within 4 minutes of the facility to render first aid to injured employees per the OSHA standard. | 1910.151(b) | Closest first responder appears to be St. Joseph Fire Station #10 which is 3.5 miles and 6 minutes by normal traffic. Obtain an official response time from the station to ensure they can get on-site within 4 minutes or train at least one employee (recommend two) in first aid and CPR. | 12-8-21 | Curtis |
| Kuhn | The eyewash bottle outside of the Men’s Room was expired (October, 2015). | 1910.151(c);  ANSI Z358.1-2009 | Add the eyewash squeeze bottles to the weekly eyewash and safety shower inspection. All bottles past the expiration date should be replaced. | 03/2016 | Scott |
| Perfekta | There is no documentation available that the facility safety showers and eyewash stations are being inspected on a weekly basis. | 1910.151(c);  ANSI Z358.1-2009 | Begin inspecting the safety shower and eyewash stations weekly. Activate all plumbed eyewashes, drench showers and drench hose systems on a weekly basis to ensure they are compliant and operational in case of an emergency. Activation also clears any sediment that may be in the supply line. Use a drench shower tester with bucket to contain the water if necessary. Document all inspections. A guidance document is included as Appendix G. | 02/2017 | Scott |
| Pegasus Labs | The facility eyewash stations and safety showers are being inspected on a monthly basis rather than weekly. | 1910.151(c);  ANSI Z358.1-2009 | Begin inspecting the safety shower and eyewash stations weekly. Activate all plumbed eyewashes, drench showers and drench hose systems on a weekly basis to ensure they are compliant and operational in case of an emergency. Activation also clears any sediment that may be in the supply line. Use a drench shower tester with bucket to contain the water if necessary. Document all inspections. A guidance document is included as Appendix K. | 08/2017 | Scott |
| NPC Valley Center and Goddard | There is no documentation available that the facility safety showers and eyewash stations are being inspected on a weekly basis. | 1910.151(c);  ANSI Z358.1-2014 | Begin inspecting the safety shower and eyewash stations weekly. Activate all plumbed eyewashes, drench showers and drench hose systems on a weekly basis to ensure they are compliant and operational in case of an emergency. Activation also clears any sediment that may be in the supply line. Use a drench shower tester with bucket to contain the water if necessary. Document all inspections. | 5-10-18 | Curtis Leiker  Scott Smith |
| ElDorado – KS | The eyewash station at the bottom of the stairs of the mezzanine break area has low flow and the push plate is incorrectly installed (Photo 14). | 1910.151(c);  ANSI Z358.1-2009 | Repair the eyewash so that there is a minimum of 0.4 gallons per minute at 30 psi. Rotate the eyewash push plate 90 degrees so that it can be found easily in the event of an emergency. | 10/2014 | Scott |
| U.S. Ambulance | **Moderate** – There are numerous eyewash stations in which a regular ball valve is being used to activate the eye wash (Photo 2724) rather than the required push plate (as shown in Photo 2726). | 1910.151(c);  ANSI Z358.1-2009 | Survey the facility and determine how many eyewash stations have regular ball valves and replace these with standard push plate type valves so that they can be found easily during an emergency. | 04/2015 | Scott |
| U.S. Ambulance | **Major** – There were at least two eyewash stations in which the water supply valve was observed in the closed position possibly delaying the flow of water in an emergency. | 1910.151(c);  ANSI Z358.1-2009 | **Note**: Both of these were corrected at the time of the audit. Consider installing LOTO devices on the water supply valves to prevent the valves from being closed. | 04/2015 | Scott |
| Sonaca | There is an eyewash station on the west wall that appears to be out of service. This eyewash station could be mistaken for a functional unit during an emergency (Photo 3). | 1910.151(c);  ANSI Z358.1-2009 | Remove the existing fixture and signage or repair the unit including replacement of the bowl and push handles. | 04/2012 | Scott |
| Capps | There are not an adequate number of eye wash / safety showers in the facility. OSHA requires that where an employee’s eyes or body are exposed to injurious corrosive materials, suitable facilities for quick drenching be provided. There is only one eye wash / safety shower for the entire facility. | 1910.151(c);  ANSI Z358.1-2009 | Install eyewashes / safety showers in all areas including the laboratory, paint area, and the chemical processing area so that employees are never more than 10 seconds or 55 feet travel distance from a drenching facility. | 06/2014 | Scott |
| Kice | Access to the emergency eyewash station was blocked in this area (Photo 8). | 1910.151(c);  ANSI Z358.1-2009 | Ensure that material is not stored around the eyewash station and that it remains accessible at all times. Consider painting an area on the floor to limit material placement. | 03/2017 | Scott |
| USD 259 | Access to the emergency eyewash bottles in this area is blocked with material (Photo 29). | 1910.151(c);  ANSI Z358.1-2014 | Ensure that material is not stored around the eyewash bottle station and that it remains accessible at all times. Consider painting an area on the floor to limit material placement. | 7/30/2018 | Scott Smith |
| Pegasus Labs | There is no eyewash station located within a 10-second or 55 foot travel distance of the battery charging area for the electric forklift in Receiving. | 1910.151(c);  ANSI Z358.1-2009 Sec. 7.4.4;  03/08/02 OSHA Letter of Interpretation | Install either a plumbed eyewash station or a self-contained eyewash station in the immediate area of the battery charging stations. | 08/2017 | Scott |
| USD 259 | The facility is using hand-held eyewash bottles, or personal wash units as defined by ANSI (Photo 29), in lieu of plumbed or self-contained eyewash stations in locations such as battery charging areas where employees are exposed to injurious corrosive materials. Personal wash units do not meet the criteria of plumbed or self-contained eyewash equipment and are designed to support plumbed and self-contained emergency eyewash and shower equipment but shall not replace them. | 1910.151(c);  ANSI Z358.1-2014 8.1.1.1 | Install plumbed or self-contained eye wash stations at all locations, such as battery charging stations, where employees are exposed to injurious corrosive materials. The eyewash station must be capable of delivering 0.4 gallons per minute for at least 15 minutes. | 7-30-2018 | Scott Smith |
| Main Building Nutrition Services | There is no eyewash station located within a 10-second or 55 foot travel distance of the battery charging area for the electric floor cleaner (Photo 31). | 1910.151(c);  ANSI Z358.1-2014 Appendix B5;  03/08/02 OSHA Letter of Interpretation | Install either a plumbed eyewash station or a self-contained eyewash station in the immediate area of the battery charging station. | 7-30-2018 | Scott Smith |
| Perfekta | While eyewash stations and safety showers are being inspected on a monthly basis, the ANSI requirement is to inspect the equipment on a weekly basis. | 1910.151(c);  ANSI Z358.1-2014 | Begin inspecting the safety shower and eyewash stations weekly. | 8/16/19 | Curtis |
| NPC | Two eyewash bottle solutions in the first aid kit are expired (see Photo 8). | 1910.151(c) | Discarded solution and replace with new solution. Ensure kits are regularly inspected. | 4-23-21 | Curtis |
| MPM | There is an expired first aid kit located in Deburr (See Photo 27). | 1910.151(c) | Discard first aid kit materials. Ensure all first aid kits are regularly inspected. | 8-23-21 | Curtis |
| Global Parts | Facility safety showers and eyewash stations are not being inspected on a weekly basis. | 1910.151(c);  ANSI Z358.1 | Begin inspecting the safety shower and eyewash stations weekly. Activate all plumbed eyewashes, drench showers and drench hose systems on a weekly basis to ensure they are compliant and operational in case of an emergency. Activation also clears any sediment that may be in the supply line. Use a drench shower tester with bucket to contain the water if necessary. Portable eyewash stations only need visual inspection and do not need flow test. Document all inspections. | 8-19-21 | Curtis |
| Pet-Ag | An eyewash station in the Processing Room is installed at a height of 53 inches at the top of the eyewash which exceeds ANSI requirements (See Photo 7). | 1910.151(c);  ANSI Z358.1 | Lower the height of the eyewash station so the height of the eyewash does not exceed 53 inches at the top of the sprayhead water peak, meaning the height of the sprayheads should not exceed 45 inches from floor level. | 5-25-2022 | Curtis |
| Pet-Ag | There are strong acids and bases stored in the Chemical Storage building where there is an eyewash station but no emergency shower. The XY-12 liquid sanitizer has a pH of 12.5 and the AC-3 acid cleaner has a pH of 0.5 – 1.0 (See Photos 16, 17). | 1910.151(c);  ANSI Z358.1 | Even though the building does not currently have plumbed water, OSHA would still cite for not having a shower station within 10 seconds. Small, portable shower units can be purchased in smaller volumes, such as 1.5 minute rated flow, but would not meet ANSI requirements. | 5/25/22 | Curtis |
| **Subpart L – Fire Protection** | | | | | |
| BG Products Wichita | The overhead roll-up fire door in the lower level blend center was last inspected in July, 2016. Periodic inspections and testing shall be performed not less than annually. | NFPA 80-2016 5.2.4.1 |  | 01/2018 | Scott |
| USD 259 | The overhead roll-up fire door in this area was last inspected in May, 2017 and is overdue for inspection. Periodic inspections and testing shall be performed not less than annually. | NFPA 80-2016 5.2.4.1 | Contact the contractor and have this door and any other doors that are overdue inspected. Ensure that all fire doors are inspected on an annual basis. | 7/30/2018 | Scott Smith |
| USD 259 | The facility has electronically supervised post indicator valves (PIVs) to isolate and control different sections of their fire water system (Photo 32). All electronically supervised PIVs must be inspected quarterly to verify that the valves are: 1). In the normal open or closed position; 2). Locked; 3). Accessible; 4). PIVs are provided with correct wrenches; 5). Free from external leaks; and 6). Provided with applicable identification. | NFPA 25-2017 13.3.2.2.1.2;  NFPA 25-2017 13.3.2.2 | Either assign and train someone internally to conduct the quarterly inspections or ensure that a licensed sprinkler contractor conducts the quarterly inspections. | 7-30-2018 | Scott Smith |
| APR – Downtown | The fire extinguisher in this area is mounted too high (70 inches)(Photo 15). | 1910.157(c)(1) | Remount the fire extinguisher so that top of extinguishers weighing less than 40 lbs. are no more than 5 feet (60 inches) off the ground and extinguishers weighing more than 40 lbs. are mounted so that the top is no more than 3 feet (36 inches) off the ground. The minimum distance between the floor and the bottom of the extinguisher for all weights is 4 inches. | 06/2017 | Scott |
| Kice | Access to the fire extinguisher outside of the Maintenance Shop was blocked (Photo 10). | 1910.157(c)(1) | Remove the material around the fire extinguishers so that it is readily accessible to employees without subjecting the employee to possible injury. Consider painting a restricted area on the floor around the fire extinguishers to keep the area clear. | 03/2017 | Scott |
| Hillsboro Industries | Access to the fire extinguisher was blocked near the sprinkler system. | 1910.157(c)(1) | Relocated fire extinguisher so it is readily accessible to employees without subjecting the employees to possible injury. | 5-23-18 | Curtis Leiker |
| Kice | The fire extinguisher in this area is sitting on the floor (Photo 9). | 1910.157(c)(1);  NFPA 10 6.1.3.8.1 thru 6.1.3.8.3 | Mount the fire extinguisher on the wall so that top of extinguishers weighing less than 40 lbs. are no more than 5 feet off the ground and extinguishers weighing more than 40 lbs. are mounted so that the top is no more than 3 feet off the ground. The minimum distance between the floor and the bottom of the extinguisher for all weights is 4 inches. | 03/2017 | Scott |
| USD 259 | There are several fire extinguishers located throughout the facility that are mounted too high. A few examples are Main Building, Milling Shop at 63 inches (Photo 37) and 62 inches (Photo 38); Chair Storage Area at 74 inches. | 1910.157(c)(1) | Survey the facility and remount the fire extinguishers so that top of extinguishers weighing less than 40 lbs. are no more than 5 feet off the ground and extinguishers weighing more than 40 lbs. are mounted so that the top is no more than 3 feet off the ground. The minimum distance between the floor and the bottom of the extinguisher for all weights is 4 inches. | 7-30-2018 | Scott Smith |
| Electromech | There are two fire extinguisher signs in this area but the fire extinguishers are missing (Photos 30, 31). | 1910.157(c)(4) | Determine if there is another fire extinguisher within 50 feet (Class B fire potential) and if so, remove the fire extinguisher signs. If there is not another fire extinguisher within 50 feet, replace the missing fire extinguishers. | 11/2015 | Scott |
| iSi Lulu | There is a fire extinguisher in this area with low pressure (Photo 11). | 1910.157(c)(4) | Have Kansas Fire recharge extinguisher. | 10/2012 | Scott / Ben |
| Bombardier | Moderate Non-Conformance - Outside: For the wheeled fire extinguisher east of the pump house, the last annual inspection was in 2006 and the pressure was low (Photos 33, 34). | 1910.157(c)(4);  1910.157(e)(3) | During discussion with Rich Brand it was determined that this extinguisher was a spare and was being used for parts. Need to either remove it from service or tag it as "out of service." | 04/2012 | Scott |
| Perfekta | There is a fire extinguisher sign in this area but the fire extinguisher was missing from its place. | 1910.157(c)(4) | Determine if there is another fire extinguisher within required distance and if so, remove the fire extinguisher signs. If there is not another fire extinguisher within the distance, replace the missing fire extinguishers. | 8/16/19 | Curtis |
| Johns Manville | Select employees will use hand held hose lines in the event of an emergency but they are only trained every other year rather than annually. | 1910.157(d)(3) | Begin training employees annually on hand held hose lines. | 12/2013 | Scott |
| E-ONE | There is a fire hose mounted on the south wall but employees are not trained on the use of the fire hose and it has not been inspected at least annually. Fire department will not use this hose in the event of an emergency (Photo 10). | 1910.157(d)(3);  1910.158(e)(2)(iii);  1910.158(e)(2)(v) | Consider removing the hose and any other hose reels from the facility or inspect the hose annually, re-rack the hose with a different fold pattern at least annually and train employees accordingly. | 05/2014 | Scott |
| iSi Lulu | The fire extinguishers within the warehouse area of the facility are too far apart. | 1910.157(d)(4) | Due to the potential for Class B fires (Flammable liquids and gasses); all fire extinguishers should be mounted no less than 50 feet travel distance apart. Have Kansas Fire survey the facility and add extinguishers where needed. | 10/2012 | Scott / Ben |
| USD 259 | There is approximately 180 feet distance between the two fire extinguishers in the main hallway. The employer shall distribute portable fire extinguishers for use by employees on potential Class A fires so that the travel distance for employees to any extinguisher is 75 feet (22.9 m) or less. | 1910.157(d)(1);  1910.157(d)(2) | Install additional fire extinguishers in the Administrative Offices so that the travel distance between extinguishers is 75 feet or less. | 7-30-2018 | Scott Smith |
| PEK | There is no evidence that the facility fire extinguishers are inspected on a monthly basis. All fire extinguishers should be inspected monthly to ensure that the gauge shows green indicating the proper pressure, the extinguisher is not blocked and is accessible, the seal is intact, and that it is in the proper location. | 1910.157(e)(1);  1910.157(e)(2) | Begin inspecting all fire extinguishers monthly. Either use the inspection card attached to each extinguisher to document the inspection or create a separate inspection form. | 11/2017 | Scott |
| MPM | There is no evidence that the facility fire extinguishers are inspected on a monthly basis. All fire extinguishers should be inspected monthly to ensure that the gauge shows green indicating the proper pressure, the extinguisher is not blocked and is accessible, the seal is intact, and that it is in the proper location. | 1910.157(e)(1);  1910.157(e)(2) | Begin inspecting all fire extinguishers monthly. Either use the inspection card attached to each extinguisher to document the inspection or create a separate inspection form. | 8-23-21 | Curtis |
| Bombardier | Minor Non-Conformance - Outside: Wheeled fire extinguisher next to fuel storage tanks north of Building 5 had a blank inspection tag and no indication of monthly or annual inspection tag. | 1910.157(e)(2);  1910.157(e)(3) | Rich Brand indicated that Learjet employees are not authorized to use wheeled fire extinguishers. Current written procedures do not reflect this. Need to ensure that wheeled fire extinguishers are inspected monthly and annually and that employees receive training on how to operate. | 04/2012 | Scott |
| Auto Craft | The fire extinguishers in the facility have not been inspected by a certified fire extinguisher contractor since 2009. The employer shall assure that portable fire extinguishers are subjected to an annual maintenance check. | 1910,157(e)(3) | A local fire extinguisher contractor should be contacted to perform this annual check and to get all extinguishers into compliance. | 06/2017 | Scott |
| Triumph – KC | There is no evidence that employees receive initial or annual fire extinguisher training. Fire extinguisher training is required initially and annually thereafter. | 1910.157(g)(1);  1920.157(g)(2) | Need to begin training employees accordingly. All training should be documented. | 03/2017 | Scott |
| MPM | There is no evidence that employees receive initial or annual fire extinguisher training. Fire extinguisher training is required initially and annually thereafter. | 1910.157(g)(1);  1910.157(g)(2) | Need to begin training employees who are allowed to use fire extinguishers. All training should be documented. See Appendix F. | 8-23-21 | Curtis |
| Kuhn | The water supply valve for the automatic sprinkler system in the flammable liquid storage room is not secured in the open position (Photo 22). Each normally open valve shall be secured by means of a seal or a lock or shall be electrically supervised. | 1910.159(a)(2);  National Fire Protection Association (NFPA) 13.3.1.3 | Install a lock on the water supply valve or provide electronic supervision for the control valve through the facility fire alarm panel. | 03/2016 | Scott |
| Kice | It appears that the fire sprinkler system is not being inspected on an annual basis. The last inspection was conducted in 2015. | 1910.159(a)(2);  National Fire Protection Association (NFPA) 25 | Have a licensed fire sprinkler contractor complete an annual inspection and ensure that the inspection is completed every year. | 03/2017 | Scott |
| Ametek | The minimum vertical clearance of at least 18 inches is not being maintained for the sprinklers in this area. Equipment is installed too close to the sprinkler head shown in Photo 10. | 1910.159(c)(10;  Letter of Interpretation dated 09/29/08 | Move the equipment so that a minimum distance of 18 inches is maintained between the equipment and the sprinkler head. | 08/2014 | Scott/James |
| ElDorado – KS | The fire suppression system in the Van Paint area has been disconnected (Photo 21) | 1910.160(b)(2);  1910.160(b)(6) | Notify employees working in the paint booths that the system has been disconnected. Contact licensed fire suppression contractor and repair and inspect the system as needed. | 10/2014 | Scott |
| Allied Labs | There is no evidence that the building smoke detectors have been inspected and tested. | 1910.164(c)(2);  1910.164(c)(4) | Contact a licensed fire detection systems contractor to perform an inspection and test of the building smoke detectors. | 04/2013 | Scott/Keith |
| Nitride Solutions | The facility does not have an employee alarm system. For those employers with 10 or fewer employees in a particular workplace, direct voice communication is an acceptable procedure for sounding the alarm provided all employees can hear the alarm. The alarm shall be capable of being perceived above ambient noise and shall be distinctive and recognizable as a signal to evacuate the work area or to perform actions designated under the Emergency Action Plan. | 1910.165(b)(1) thru (b)(5) | Install an alarm system that meets the requirements of the OSHA standard. Consider installing air horns throughout the facility. Train all employees on the preferred means of reporting emergencies. All training should be documented. | 06/2016 | Scott |
| **Subpart M – Compressed Gas and Compressed Air Equipment** | | | | | |
| Excel Industries | Safety valves on compressed air receivers are not being tested at frequent intervals to determine if they are in good operating condition to prevent employee exposure to struck-by hazards. | 1910.169(b)(3)(iv) | Ensure all safety relief valves are being tested at frequent and regular intervals to prevent possible over pressurization of tank. | 12-2-19 | Curtis |
| Hillsboro Industries | The safety valve on the compressed air receiver is not being tested at frequent intervals to determine if it is in good operating condition to prevent employee exposure to struck-by hazards (see Photo 13). | 1910.169(b)(3)(iv) | Ensure all safety relief valves are being tested at frequent and regular intervals to prevent possible over pressurization of tank. Use manufacturer specifications. If not mentioned or unable to obtain, complete on at least a 5 year frequency. | 6-17-21 | Curtis |
| MPM | The safety valve on the compressed air receivers is not being tested at frequent intervals to determine if it is in good operating condition to prevent employee exposure to struck-by hazards (See Photo 29). | 1910.169(b)(3)(iv) | Ensure the safety relief valve is being tested at frequent and regular intervals to prevent possible over pressurization of tank. Use manufacturer specifications. If not mentioned or unable to obtain, complete on at least a 5 year frequency. See Appendix G. | 8-23-21 | Curtis |
| Ultra Clean Midwest | The safety valve on the compressed air receiver is not being tested at frequent intervals to determine if it is in good operating condition to prevent employee exposure to struck-by hazards (See Photo 8718). | 1910.169(b)(3)(iv) | Ensure the safety relief valve is being tested at frequent and regular intervals to prevent possible over pressurization of tank. Use manufacturer specifications if available. | 12-8-21 | Curtis |
| **Subpart N – Materials Handling and Storage** | | | | | |
| Pet-Ag | Pedestrian aisles are not marked in the Warehouse where powered industrial trucks are used (See Photo 11). Permanent aisles and passageways shall be appropriately marked. | 1910.176(a) | Use tape, paint, other floor markings, or barriers to designate where pedestrian traffic should walk or where designated forklift traffic is taking place. | 9-14-21 | Curtis |
| Lubrication Engineers | Material is stacked right on the edge of the Label Hut subjecting employees walking below to an injury from falling objects (Photo 6). | 1910.176(b) | Either remove the material from the top of the Label Hut or rope off the area below to prevent employees from walking next to the building. | 03/2014 | Scott |
| Mid Continent | Idle pallets are being stored too close to the building (Photo 25). The minimum distance for the storage of over 200 pallets is 50 feet from the building. For 50-200 pallets the minimum distance is 30 feet and for less than 50 pallets the minimum distance is 20 feet | 1910.176(b);  NFPA 230 12.3 | More the pallets so that they are at least 50 feet from any building. | 06/2014 | Scott |
| NPC  Goddard | Material storage in Building 3 was found to be leaning significantly due to collapse of box (see Photo 7). | 1910.176(b) | De-stack material and ensure material storage is stored in stable and secure heights. | 8-23-2020 | Curtis |
| Global Parts | Employee are servicing rim wheels but at the time of the audit there was no evidence employees have been trained in the hazards involved and the safety procedures to be followed. | 1910.177(c) | Implement a training program for employees who service rim wheels that includes all applicable safety and procedural issues. All training should be documented. | 8-19-21 | Curtis |
| Kice | The directional and load handling lever controls on the forklift in this area are not labeled. The controls shall be clearly and durably identified on the control or in close proximity to indicate function(s) and direction of motion of load or equipment. | 1910.178(a)(6);  ANSI B56.1: 7.18;  ANSI B56.1: 7.25.1(c) | Survey the facility forklifts and label the controls accordingly. Labels can be affixed to the forklift frame under the control rods if necessary. | 03/2017 | Scott |
| Valley Center and Goddard | The right two directional or load handling lever controls on the Yale Forklift #1 in Valley Center are not labeled (see Photo 17). In addition, Yale 376 at Goddard does not have lever controls (see Photo 18). The controls shall be clearly and durably identified on the control or in close proximity to indicate function(s) and direction of motion of load or equipment. | 1910.178(a)(6);  ANSI B56.1: 7.18;  ANSI B56.1: 7.25.1(c) | Survey the facility forklifts and label the controls accordingly. Labels can be affixed to the forklift frame under the control rods if necessary. | 10-9-18 | Curtis Leiker  Scott Smith |
| Pet-Ag | Forklift #10 (See Photo 12), #11, and one newer rental do not have the right directional or load handling lever control labeled. The controls shall be clearly and durably identified on the control or in close proximity to indicate function(s) and direction of motion of load or equipment. | 1910.178(a)(6) | Survey the facility forklifts and label the controls accordingly. Labels can be affixed to the forklift frame under the control rods if necessary. | 9-14-21 | Curtis |
| Kuhn | The facility has fabricated or purchased forklift blade extensions which will alter the forklift center of gravity and therefore the lifting capacity of the forklift (Photo 26). | 1910.178(a)(4);  1910.178(a)(5) | Contact forklift manufacturer to get revised capacity rating with forklift extensions. The forklift data plate will need to be updated with the new lifting limits. | 03/2016 | Scott |
| Kuhn | It appears that the facility is using a homemade platform to elevate personnel using a forklift (Photo 25). There is no evidence that the facility has received written approval from the forklift manufacturer to use this platform. | 1910.178(a)(4);  03/30/04 OSHA Letter of Interpretation (see Appendix L);  ANSI B56.1-1969 4.17.1, 4.17.2, 4.17.3 | Consult the forklift owner’s manual or contact the manufacturer to obtain written approval to use personnel lifting platforms. If no response or a negative response is received from the manufacturer, a qualified, Registered Professional Engineer must perform a safety analysis and address any safety or structural issues contained in the manufacture’s negative response before granting written approval to use the platform. | 03/2016 | Scott |
| Hillsboro Industries | There are several forklift lifting attachments used throughout the facility that do not have written approval to be used from the forklift manufacturer (see Photo 2368). | 1910.178(a)(4) | Consult the forklift the manufacturer to obtain written approval to use attachments. If no response or a negative response is received from the manufacturer, a qualified, Registered Professional Engineer must perform a safety analysis and address any safety or structural issues contained in the manufacture’s negative response before granting written approval to use the platform. Data plates should be modified accordingly. | 5-23-18 | Curtis |
| Main Building General Warehouse / Building Repair | It appears that the facility is using homemade platforms to elevate personnel using a forklift (Photos 39, 40). There is no evidence that the facility has received written approval from the forklift manufacturer to use these platforms. | 1910.178(a)(5);  03/30/04 OSHA Letter of Interpretation (see Appendix I);  ANSI B56.1-1969 4.17.1, 4.17.2, 4.17.3 | Consult the forklift owner’s manual or contact the manufacturer to obtain written approval to use personnel lifting platforms. If no response or a negative response is received from the manufacturer, a qualified, Registered Professional Engineer must perform a safety analysis and address any safety or structural issues contained in the manufacture’s negative response before granting written approval to use the platforms. | 7-30-2018 | Scott Smith |
| Kansas Ethanol | The facility is using a drum lifting forklift attachment (see Photo 2890) but has not got written approval from manufacturer to use with the forklift. Capacity, operation, and maintenance instruction plates, tags, or decals shall be changed accordingly. If the truck is equipped with front-end attachments other than factory installed attachments, the user shall request that the truck be marked to identify the attachments and show the approximate weight of the truck and attachment combination at maximum elevation with load laterally centered. | 1910.178(a)(4)  1910.178(a)(5)  Letter of Interpretation 7-3-02 | Consult the forklift owner’s manual or contact the manufacturer to obtain written approval to use the forklift lifting attachment. If no response or a negative response is received from the manufacturer, a qualified, Registered Professional Engineer must perform a safety analysis and address any safety or structural issues contained in the manufacture’s negative response before granting written approval to use the platform. | 11-7-18 | Curtis |
| Hillsboro Industries | There are several forklift lifting attachments used throughout the facility that do not have written approval to be used from the forklift manufacturer (see Photo 4253). | 1910.178(a)(4)  1910.178(a)(5)  Letter of Interpretation 7-3-02 | Consult the forklift the manufacturer to obtain written approval to use attachments. If no response or a negative response is received from the manufacturer, a qualified, Registered Professional Engineer must perform a safety analysis and address any safety or structural issues contained in the manufacture’s negative response before granting written approval to use the attachment. Data plates should be modified accordingly. | 7-10-19 | Curtis |
| MPM | There is a forklift lifting attachment for a drum lifter, model DGS-55-D, that does not have written approval to be used from the forklift manufacturer (See Photo 30). | 1910.178(a)(4)  1910.178(a)(5)  Letter of Interpretation 7-3-02 | Consult the forklift the manufacturer to obtain written approval to use attachments. If no response or a negative response is received from the manufacturer, a qualified, Registered Professional Engineer must perform a safety analysis and address any safety or structural issues contained in the manufacture’s negative response before granting written approval to use the attachment. Data plates should be modified accordingly. | 8-23-21 | Curtis |
| Sonaca | A heater has been installed on the Shipping forklift which obstructs the load capacity on the forklift nameplate (Photo 5). | 1910.178(a)(6) | Relocate the heater so that the nameplate and forklift lifting capacity is legible. | 04/2012 | Scott |
| NPC Valley Center | The nameplate on Forklift L-12 in the Line 12 area is not is not legible (see Photo 19). | 1910.178(a)(6) | Clean all of the pigment and dirt from the nameplate so that it is legible. Consider adding the task of cleaning the nameplate to the daily forklift inspection. | 10-9-18 | Curtis Leiker |
| Mid Continent Cabinetry | Nameplates or markings for powered industrial trucks were not in place or were not maintained in a legible condition. | 1910.178(a)(6) | SEE OSHA citation. Employees engaged in forklift operations and material handling activities in Building 2 at the Panel area were exposed to struck-by hazards in that identifying markings were absent from the control levers to indicate the actions the levers performed. The fork side shift indicator lever was not labeled. | 6/26/18 | OSHA Citation |
| MPM | The right two directional or load handling lever controls on the Daewoo forklift are not labeled (See Photo 31) and one lever control on the Toyota forklift is not labeled (See Photo 32). The controls shall be clearly and durably identified on the control or in close proximity to indicate function(s) and direction of motion of load or equipment. | 1910.178(a)(6) | Survey the facility forklifts and label the controls accordingly. Labels can be affixed to the forklift frame under the control rods if necessary. | 8-23-21 | Curtis |
| E-ONE | It does not appear that wheel chocks are being used when facility forklifts load and unload trucks (Photo 11). The brakes of highway trucks shall be set and wheel chocks placed under the rear wheels to prevent the trucks from rolling while they are boarded with powered industrial trucks (forklifts). | 1910.178(k)(1) | Provide wheel chocks and require that all trucks be chocked before forklifts load or unload the truck. | 05/2014 | Scott |
| HOC | One trailer was observed without wheel chocks while being loaded with full pallets of product on door #10. The brakes of highway trucks shall be set and wheel chocks placed under the rear wheels to prevent the trucks from rolling while they are boarded with powered industrial trucks (forklifts). | 1910.178(k)(1) | Require that all trucks be chocked before forklifts load or unload the truck. | 5/28/19 | Curtis |
| Capps | There was no documentation that employees have been trained on the use of the forklift. Initial training is required and recertification is required every three years. | 1910.178(l) | Develop an OSHA compliant forklift training program or purchase a training package and conduct documented training for all forklift operators. | 06/2014 | Scott |
| Kuhn | A spot check of four forklift operators showed that one operator did not have the required training. Initial training is required and recertification is required every three years. | 1910.178(l) | Develop a method to ensure that all forklift operators are trained appropriately. | 03/2016 | Scott |
| Dragoo Metal Works | Employees who use forklifts are receiving practical training, but are not receiving formal instruction or a performance evaluation. | 1910.178(l)(2)(ii) | Implement a formal training program which can be lecture, discussion, interactive computer learning, video, or written material. After receiving practical training, complete a formal evaluation of the forklift driver’s performance. All training should be documented. | 12-7-21 | Curtis |
| Pet-Ag | While employees are trained and initially evaluated on their driving performance with powered industrial trucks, there is no evaluation on employee’s performance being conducted at least once every three years. | 1910.178(l)(4)(iii) | Implement a tracking procedure to ensure all current powered industrial truck operators are having their driving performance evaluated in a period not to exceed three years. The evaluation needs to be certified by the employer and include name of operator, date of evaluation, and identify of person performing evaluation. | 05/2022 | Curtis |
| NPC | An employee was observed working underneath an elevated forklift load to push material into the process equipment. No person shall be allowed to stand or pass under the elevated portion of any truck, whether loaded or empty. | 1910.178(m)(2) | Ensure necessary tools are available to employees to reach where needed without putting their body under an elevated loaded and recommunicate to employees to not work under such loads. | 6-22-22 | Curtis |
| NPC | One forklift was observed without the parking brake set (Photo 9). | 1910.178(m)(5)(i) | Ensure that all forklift operators are trained according to the OSHA forklift standard that requires the parking brake be set when the forklift is unattended. | 04/2017 | Ben |
| Hillsboro Industries | One forklift was observed without the parking brake set. | 1910.178(m)(5)(i) | Ensure that all forklift operators are trained according to the OSHA forklift standard that requires the parking brake be set when the forklift is unattended. | 5-23-18 | Curtis Leiker |
| Kansas Ethanol | Forklift observed that was left unattended with load elevated (see Photo 2886). When a powered industrial truck is left unattended, load engaging means shall be fully lowered, controls shall be neutralized, powered shall be shut off, and brakes set. | 1910.178(m)(5)(i) | Ensure that all forklift operators are trained according to the OSHA forklift standard that requires the load to be fully lowered if forklift is unattended. | 11-7-18 | Curtis Leiker |
| TECT Aerospace | A forklift was observed unattended with the load left in the raised position (Photo 27). | 1910.178(m)(5)(iii) | When the operator of an industrial truck is dismounted and within 25 ft. of the truck still in his view, the load engaging means shall be fully lowered, controls neutralized, and the brakes set to prevent movement. Need to train employees accordingly. | 05/2014 | Scott |
| NPC | A forklift driver was observed traveling forward with an obstructed view (Photo 6). | 1910.178(n)(4) | Ensure that all forklift operators are trained according to the OSHA forklift standard that requires the operator to travel with the load trailing if the forward view is obstructed. | 06/2012 | Scott |
| Custom Cupboards | The facility is using plywood in lieu of a standard dock plate (Photo 14). The dock plate is not secured and the forklift most likely exceeds the rated load capacity of the plywood. | 1910.178(n)(11) | Replace the plywood with a standard dock plate that is designed for this type of use. | 02/2014 | Scott |
| NPC | Seat belt on forklift #9 was observed to be ripped and in poor condition (see Photo 4548). Any powered industrial truck found to be in need of repair, defective, or in any way unsafe, the truck shall be taken out of service until it has been restored to safe operating condition. | 1910.178(p)(1) | Remove forklift from service until seatbelt can be replaced by an authorized person. | 9/24/19 | Curtis |
| MPM | Several forklifts are in operation without the horn working properly. | 1910.178(p)(1) | Take the forklifts out of service until the horns can be repaired.  See Appendix H. | 8-23-21 | Curtis |
| Allied Labs | The brake pedal cover is missing (Photo 28). | 1910.178(q)(5) | Replace the brake pedal cover | 04/2013 | Scott/Keith |
| Autotech | There was no indication that the facility forklift is inspected on a daily basis. | 1910.178(q)(7) | Begin a daily forklift inspection program to be conducted at the beginning of each shift in which the forklift is used. Inspections should be documented. | 06/2017 | Scott |
| Kice Industries | While powered industrial trucks are being inspected on the first shift, there are no inspections being completed on the second shift. Where industrial trucks are used on a round-the-clock basis, they shall be examined after each shift. | 1910.178(q)(7) | Begin completing inspections of powered industrial trucks on the second shift. | 5-14-19 | Curtis |
| Ultra Clean Midwest | There was no indication that the facility forklift is inspected on a daily basis. Where industrial trucks are used on a round-the-clock basis, they shall be examined after each shift. | 1910.178(q)(7) | Begin a daily forklift inspection program to be conducted at the beginning of each shift in which the forklift is used. Inspections should be documented, although not mandatory by OSHA. | 12-8-21 | Curtis |
| Hillsboro Industries | In house lifting attachments are being used on crane (see Photo 4240). Non-engineered devices should not be used. Only those devices which meet good engineering design, construction, inspection, and use should be used. | 1910.179  LOI 6/26/2002  ASME B30.20 | Replace in house lifting attachments with engineered and certified ones or get Professional Engineer to certify current attachment. | 7-10-19 | Curtis |
| ElDorado – KS | The rated load marking for the overhead hoist in the Interior 1 area is not readily visible from the ground floor (Photo 23). The rated load of the hoist shall be plainly marked on each side of the crane and this marking shall be clearly legible from the ground or floor. | 1910.179(b)(5) | Label the overhead hoist accordingly. | 10/2014 | Scott |
| Kice Industries | The rated load marking for the overhead bridge crane through the paint booth is not readily visible from the ground floor (see Photo 2311). The rated load of the crane shall be plainly marked on each side of the bridge crane and this marking shall be clearly legible from the ground or floor. | 1910.179(b)(5) | Label the overhead bridge crane accordingly on all sides. | 5-16-18 | Curtis |
| NPC Valley Center | The rated load marking for the overhead chainfall hoist in the Line 6 area is not readily visible from the ground floor (see Photo 20). The rated load of the hoist shall be plainly marked on each side of the crane and this marking shall be clearly legible from the ground or floor. | 1910.179(b)(5) | Label the overhead hoist accordingly. | 10-9-18 | Curtis Leiker  Scott Smith |
| MPM | The rated load marking for the 500-lbs overhead jib crane is not readily visible from the ground floor (See Photo 33). The rated load of the crane shall be plainly marked on each side of the bridge crane and this marking shall be clearly legible from the ground or floor. | 1910.179(b)(5) | Label the overhead bridge crane accordingly on all sides. | 8-23-21 | Curtis Leiker |
| Ultra Clean Midwest | A rated load marking for the overhead crane is not readily visible from the ground floor (See Photo 8700). The rated load of the crane shall be plainly marked on each side of the crane and this marking shall be clearly legible from the ground or floor. The crane currently has two hoisting units. If more than one hoisting unit is used, each hoisting unit shall have its rated load marked on it or the load block. | 1910.179(b)(5) | Label the overhead crane accordingly on all sides. Also, if the secondary hoisting unit is no longer used, remove from service. If the secondary hoisting unit will remain, both hoisting units need rated load limits posted on each unit. | 12-8-21 | Curtis |
| Kuhn | The rated load marking posted on the rail of the Hem Saw overhead hoist is 1 ton (2,000 pounds); however, the posted rated load marking for the lifting device is 2 tons (4,000 pounds) (Photo 29). There is a potential for the hoist to be overloaded if the operator loads the hoist with up to 2 tons. In addition, the rated load tag for the lifting device is not legible. | 1910.179(b)(5);  1910.179(k)(2);  1910.179(n)(1);  1910.179(n)(2)(ii) | Contract with a hoist vendor to conduct and document a rated load test with the lifting device in place. Label the overhead hoist and the lifting device accordingly so that the lifting device capacity does not exceed that of the overhead hoist. | 03/2016 | Scott |
| MPM | Employees are operating overhead cranes without any formal training. The employer must designate personnel who are adequately qualified to operate cranes. | 1910.179(b)(8) | Have all employees who are operating cranes complete training. | 8-23-21 | Curtis |
| Global Parts | Employees are operating a 1,000 pound overhead crane without any formal training (See Photo 10). The employer must designate personnel who are adequately qualified to operate a crane. | 1910.179(b)(8) | Have all employees who are operating the crane complete training. | 8-19-21 | Curtis |
| NPC | Employees are operating overhead cranes without any formal training. The employer must designate personnel who are adequately qualified to operate cranes. | 1910.179(b)(8) | Have all employees who are operating cranes complete training. The standard does not explicitly state training; however, OSHA cites the requirement as a training requirement. Standard just says “designated” which means “qualified” which turns into training. See attached OSHA citation and letter of interpretation. | 9-28-22 | Curtis |
| Atlas Aerospace | The overhead hoist pendent control does not have labeling identifying the button functions (Photo 5). (g) Requirement to prevent electrical shock and provide labels. (l) Requirement to keep clean and legible. | 1910.179(g)(1)(v);  1910.179(l)(3)(iii)(d) | Replace the missing pendent control function labels. | 07/2014 | Scott |
| Perfekta | The 4,000-pound overhead crane pendent control is missing labels identifying the button functions. | 1910.179(g)(1)(v);  1910.179(l)(3)(iii)(d) | Replace the missing pendent control function labels. | 8/16/19 | Curtis |
| Atlas Aerospace | The overhead hoist pendant control does not have labeling identifying the button functions (see Photo 2255). | 1910.179(g)(1)(v);  1910.179(l)(3)(iii)(d) | Replace the missing pendent control function labels | 5-9-18 | Curtis |
| Excel Industries | A crane (hoist 968) has the up and down control buttons reversed from the actual direction of travel of the crane (see Photo 4857). | 1910.179(g)(1)(v) | Change the labeling of the pendant control so the buttons are correctly identifying the direction of movement of the crane. | 12-2-19 | Curtis |
| Triumph – KC | There was no documentation available indicating that frequent (daily or monthly) inspections or periodic (1 to 12 month) inspections are being performed on the overhead hoists. | 1910.179(j)(1)(ii);  1910.179(j)(1)(ii)(a);  1910.179(j)(1)(ii)(b);  1910.179(j)(2);  1910.179(j)(2)(iii);  1910.179(j)(2)(iv) | Develop a monthly overhead and hoist inspection program. This is typically performed by the facility maintenance staff. Develop an annual hoist inspection program. This is typically performed by an outside contractor. A summary of all hoist inspection requirements is included as Appendix G. | 03/2017 | Scott |
| Hillsboro Industries | There was no documentation available indicating that frequent (daily or monthly) inspections or periodic (1 to 12 month) inspections are being performed on the overhead cranes. | 1910.179(j)(1)(ii);  1910.179(j)(1)(ii)(a);  1910.179(j)(1)(ii)(b);  1910.179(j)(2);  1910.179(j)(2)(iii);  1910.179(j)(2)(iv) | Develop a monthly overhead and hoist inspection program. This is typically performed by the facility maintenance staff. Develop an annual hoist inspection program. This is typically performed by an outside contractor. | 5-23-18 | Curtis Leiker |
| Kuhn | Monthly hoist inspections are being performed by the facility maintenance staff but there was no documentation available indicating that periodic (annual) inspections are being performed on the overhead hoists. | 1910.179(j)(3);  1910.179(j)(3)(i) thru (x) | Develop an annual hoist inspection program. This is typically performed by an outside contractor. A summary of all hoist inspection requirements is included as Appendix M. | 03/2016 | Scott |
| Perfekta | While annual inspections are being performed on overhead cranes and hoists, there was no documentation available indicating that frequent (daily to monthly) inspections are being performed. | 1910.179(j)(2);  1910.179(j)(2)(i) thru (vii) | Develop a monthly overhead and hoist inspection program. This is typically performed by the facility maintenance staff. A summary of all hoist inspection requirements is included as Appendix H. | 02/2017 | Scott |
| Atlas Aerospace | While annual inspections are being performed on overhead cranes and hoists, there was no documentation available indicating that frequent (daily to monthly) inspections are being performed. | 1910.179(j)(2);  1910.179(j)(2)(i) thru (vii) | Develop a monthly overhead and hoist inspection program. This is typically performed by the facility maintenance staff. | 5-9-18 | Curtis Leiker |
| Kice Industries | While periodic (annual) inspections and frequent (daily) inspections are being performed on overhead cranes and hoists, there was no documentation available indicating that frequent (monthly) inspections are being performed. | 1910.179(j)(2);  1910.179(j)(2)(i) thru (vii) | Develop a monthly overhead and hoist inspection program. This is typically performed by the facility maintenance staff once they are trained. | 5-16-18 | Curtis Leiker |
| Kansas Ethanol | While annual (periodic) inspections are being performed on overhead cranes and hoists, there was no documentation available indicating that frequent (daily to monthly) inspections are being performed. | 1910.179(j)(2);  1910.179(j)(2)(i) thru (vii) | Develop a daily and monthly overhead and hoist inspection program on cranes in regular use. Monthly inspections are typically performed by the facility maintenance staff. A summary of all hoist inspection requirements is included as Appendix H. | 11-7-18 | Curtis |
| Hillsboro Industries | While periodic inspections (annual) and frequent inspections (daily) are being completed on overhead cranes, there was no documentation available indicating that frequent (monthly) inspections are being performed. | 1910.179(j)(1)(ii);  1910.179(j)(1)(ii)(a);  1910.179(j)(2)(i) thru (vii) | Develop a monthly overhead and hoist inspection program. This is typically performed by the facility maintenance staff, but can be performed by contactors. Documentation must be maintained as a certification record with includes the date of inspection and the signature of the person who performed the inspection. | 7-10-19 | Curtis |
| Perfekta | While periodic (annual) inspections and frequent (daily) inspections are being performed on overhead cranes and hoists, there was no documentation available indicating that frequent (monthly) inspections are being performed. | 1910.179(j)(2);  1910.179(j)(2)(i) thru (vii) | Develop a monthly overhead and hoist inspection program. This is typically performed by the facility maintenance staff once they are trained. However, a third party can complete the inspections as well. | 8/16/19 | Curtis |
| MPM | There was no documentation available indicating that frequent (daily **and** monthly) inspections or periodic (1 to 12 month) inspections are being performed on the overhead cranes. | 1910.179(j)(1)  1910.179(j)(2)  1910.179(j)(3) | Develop a daily functional testing inspection routine. This does not need to be documented.  Develop a monthly overhead crane inspection program. This is typically performed by the facility maintenance staff, but can be done by a vendor. This is required to be documented.  Develop an annual hoist inspection program. This is typically performed by an outside contractor. This is required to be documented.  A summary of all crane inspection requirements is included as Appendix I. | 8-23-21 | Curtis |
| Global Parts | There was no documentation available indicating that frequent (daily **and** monthly) inspections or periodic (1 to 12 month) inspections are being performed on the overhead hoists. | 1910.179(j)(1)  1910.179(j)(2)  1910.179(j)(3) | Develop a daily functional testing inspection routine. This does not need to be documented.  Develop a monthly overhead and hoist inspection program. This is typically performed by the facility maintenance staff, but can be done by a vendor. This is required to be documented.  Develop an annual hoist inspection program. This is typically performed by an outside contractor. This is required to be documented.  A summary of all crane inspection requirements is included as Appendix H. | 8-19-21 | Curtis |
| NPC | The hook on the far right hoist in the blending room is distorted beyond the allowable throat opening (Photo 7). | 1910.179(j)(2)(iii) | Replace the existing hoist hook. | 06/2012 | Scott |
| Lubrication Engineers | There was no documentation available indicating that periodic (annual) inspections are being performed on the overhead hoist in the maintenance shop. | 1910.179(j)(3);  1910.179(j)(3)(i) thru (x) | Develop an annual overhead crane and hoist inspection program. This is typically performed by an outside hoist equipment contractor. | 03/2014 | Scott |
| Kansas Ethanol | Standby cranes shall be inspected at least semi-annually in accordance with the requirements for frequent inspections. | 1910.179(j)(4)(iii) | Ensure all facility cranes that are not in regular use are inspected every 6 months with the same inspection criteria as the monthly inspections. | 11-7-18 | Curtis |
| PBI Gordon | The facility has constructed lifting devices for most of their overhead hoists and cranes (Photos 36, 37). OSHA standards require that the load shall be attached to the load block hook by means of slings or other approved devices. There is no evidence that these fabricated lifting devices were included in a rated load test of the hoists. | 1910.179(k)(2);  1910.179(n)(2)(ii) | Contract with hoist vendor to conduct and document a rated load test with the fabricated devices in place. | 05/2013 | Scott |
| ElDorado – KS | The hoist hook latch is broken on the 1/4 ton hoist located in the Internal Assembly 1 (Photo 24). | 1910.179(l)(3)(iii);  1910.179(l)(3)(iii)(c) | Repair the hook latch. | 10/2014 | Scott |
| NPC | There is a synthetic sling hanging outside of the maintenance shop that is not being inspected periodically. Slings should be inspected at a minimum of annually for normal service use or monthly to quarterly for slings with severe service use. | 1910.184;  OSHA Guidance on Sling Use | Add the sling to the annual sling inspection sheet and begin inspecting accordingly. | 07/2014 | Scott |
| E-ONE | There are some chain slings located in the NW corner in which the safety latch has been removed (Photo 12) and another chain sling in which the safety latch is broken (Photo 13). | 1910.184(c)(1);  1910.184(e)(7)(i) | The chain slings should be taken out of service until they can be repaired or replaced. | 05/2014 | Scott |
| MPM | A chain sling was observed with wire substituting a previously broken metal chain link (See Photo 34). | 1910.184(c)(1);  1910.184(e)(7)(i) | Remove the chain sling from service. | 8-23-21 | Curtis |
| MPM | A sling was observed with a significant tear or cut (See Photo 35). | 1910.184(c)(1);  1910.184(i)(9) | Remove the sling from service. | 8-23-21 | Curtis |
| NPC | One sling outside of the maintenance shop was observed in which a knot was tied in the sling. Slings shall not be shortened with knots or bolts or other makeshift devices. | 1910.184(c)(2) | Discontinue the use of this knotted sling and replace it. Train all employees that the use of knots in slings is prohibited. | 07/2014 | Scott |
| NPC Valley Center | One sling inside of the maintenance shop was observed in which a knot was tied in the sling (see Photo 21). Slings shall not be shortened with knots or bolts or other makeshift devices. | 1910.184(c)(2) | Discontinue the use of this knotted sling and replace it. Train all employees that the use of knots in slings is prohibited. | 10-9-18 | Curtis Leiker  Scott Smith |
| Atlas Aerospace | There is no formal program in place to conduct a periodic inspection of all lifting slings. Several slings showed excessive wear (and example is shown in Photo 19). All slings should be inspected at a minimum of annually for normal service use or monthly to quarterly for slings with severe service use. | 1910.184(d);  OSHA Guidance on Sling Use | Survey the facility to determine how many slings exist. This includes synthetic, chain, wire rope, and metal mesh slings. Either train someone internally to provide periodic sling inspections or contract with an outside company to inspect all slings at least annually. A list of all slings used at the facility should be developed to ensure that all slings are inspected periodically. | 06/2016 | Scott |
| Atlas Aerospace | There is no formal program in place to conduct a periodic inspection of all lifting slings. Several slings showed excessive wear. All slings should be inspected at a minimum of annually for normal service use or monthly to quarterly for slings with severe service use. | 1910.184(d) | Survey the facility to determine how many slings exist. This includes synthetic, chain, wire rope, and metal mesh slings. Either train someone internally to provide periodic sling inspections or contract with an outside company to inspect all slings at least annually. A list of all slings used at the facility should be developed to ensure that all slings are inspected periodically. | 5-9-18 | Curtis Leiker |
| Perfekta | There is no formal program in place to conduct a periodic inspection of all lifting slings. All slings should be inspected at a minimum of annually for normal service use or monthly to quarterly for slings with severe service use. | 1910.184(d) | Survey the facility to determine how many slings exist. This includes synthetic, chain, wire rope, and metal mesh slings. Either train someone internally to provide periodic sling inspections or contract with a third party to inspect all slings at least annually. A list of all slings used at the facility should be developed to ensure that all slings are inspected periodically. | 8/16/19 | Curtis |
| MPM | There is no formal program in place to conduct a periodic inspection of all lifting slings. All slings should be inspected at a minimum of annually for normal service use or monthly to quarterly for slings with severe service use. | 1910.184(d); | Survey the facility to determine how many slings exist. This includes synthetic, chain, wire rope, and metal mesh slings. Either train someone internally to provide periodic sling inspections or contract with an outside company to inspect all slings at least annually. A list of all slings used at the facility should be developed to ensure that all slings are inspected periodically. | 8-23-21 | Curtis |
| NPC | A chain sling was observed without an identification tag (See Photo 9). Alloy steel chain slings shall have permanently affixed durable identification stating size, grade, rated capacity, and reach. | 1910.184(e)(1) | Either get a replacement tag from the original manufacturer or replace chain sling with one that has identification tag. | 3-22-22 | Curtis |
| Champion Bus | **Moderate** – There is a synthetic sling in this area that has excessive snags, punctures, tears or cuts (Photo 32). | 1910.184(i)(9);  1910.184(i)(9)(iv) | Remove the sling from service. | 03/2015 | Scott |
| Auto Craft | **Major** - There is a synthetic sling used at the frame straightener area that has excessive snags, punctures, tears or cuts. The internal red warning thread is visible (Photo 18). | 1910.184(i)(9);  1910.184(i)(9)(iv) | Remove the sling from service. | 07/2017 | Scott |
| Hillsboro Industries | Sling was observed with significant tear or cut (see Photo 2364). | 1910.184(i)(9) | Remove the sling from service. | 5/23/18 | Curtis Leiker |
| **Subpart O – Machinery and Machine Guarding** | | | | | |
| Atlas – OSHA Inspection | An employee was exposed to amputations hazards in that the interlocks for the safety doors DMR 500 Linear were rendered in an inoperable position to accommodate an oversize metal plate for machining. | 1910.212(a)(1) |  | 2019 | OSHA |
| MPM | The interlocks for the safety doors to the CNC machine Fadal 4020A (See Photo 36) seem to be bypassed as the machine was running with the doors open. | 1910.212(a)(1) | Complete a survey to determine if any safety door interlocks are bypassed and reactive the interlocks to the safety doors. | 8-23-21 | Curtis |
| Atlas Aerospace | The medium (Photo 21) and small (Photo 22) Chambersburg drop hammers are unguarded. The machines can be operated one-handed by using the yellow arm (Photo 23) exposing the operator to crush hazards. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Guard machines to protect the operator and other personnel in the area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks. Examples of guarding methods are: barrier guards (similar to the existing large drop hammer machine), two-hand tripping devices, electronic safety devices, etc. | 06/2016 | Scott |
| Atlas Aerospace | There are several bench top belt sanders throughout the facility in which the safety guards protecting the spindle and drive pulley are missing. A few examples are: Hand Form Area; | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Replace the original guards, fabricate new guards, or replace the machines. | 06/2016 | Scott |
| Atlas Aerospace | There are several belt sanders in which the safety guards protecting the spindle, belt, or drive pulley are missing (see Photos 2219, 2220, 2261, 2266). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Replace the original guards, fabricate new guards, or replace the machines. | 5-9-18 | Curtis Leiker |
| Kuhn | The lathes in the following areas do not have a point of operation chuck shields installed to protect the operator from flying material: Tool and Die – LeBlond lathe (Photo 40) and Monarch lathe (Photo 41). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Install shields similar to the ones shown in Example Photos 10 and 11. | 03/2016 | Scott |
| Infinitech | The drill press does not have a point of operation chip shield (Photo 7). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Survey the facility to determine how many drill presses need chip shields. Install a shield on the drill presses. OSHA allows a flat, plastic shield on a flexible support, which can be attached to the drill press and moved into position when needed (See Example Photo 1). Other possibilities are included in Example Photos 2, 3. Example photos are on page 9 and 10 of the photo pages. | 06/2014 | Scott |
| Faultless | **Moderate** – There is a pinch point on the de-palletizer slat conveyor belt between the conveyor and the bottom metal support piece (Photo 16). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Fabricate and install a shield that covers the pinch point on the conveyor belt. | 02/2015 | Scott |
| Perfekta | There are several drill presses and milling machines that do not have a point of operation chip shield. A few examples are: 480 East – Deburr Shop (Photo 25), Maintenance Shop (Photo 26); 480 West – Alliant Mills milling machine (Photo 27); 707 Building – Bridgeport milling machine (Photo 28). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Survey the facility to determine how many drill presses and milling machines need chip shields. Install chip shields as needed. OSHA allows a flat, plastic shield on a flexible support, which can be attached to the machine and moved into position when needed (See Example Photo 7). Other possibilities are included in Example Photos 8 and 9. | 02/2017 | Scott |
| Atlas Aerospace | There are several drill presses that do not have point of operation machine guards (see Photos 2217, 2229, 2231, 2262, 2268) | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Survey the facility and determine how many drill presses need point of operation guards. OSHA allows a flat, plastic shield on a flexible support, which can be attached to the drill press and moved into position when needed as an example. | 5-9-18 | Curtis Leiker |
| Faultless | **Moderate** - The Marvel horizontal hacksaw has an unguarded saw blade (Photo 19). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Determine if a suitable guard can be purchased or fabricated and install. If not, consider replacing the saw. | 02/2015 | Scott |
| Atlas Aerospace | The doors to the gates for the personnel barrier cage on the FA450 III machine were open on both ends of the machine while the machine was running indicating that the that the electrical safety interlock has been bypassed (Photo 14). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Repair the safety interlock on this machine and check all similar machines to determine how many safety interlocks have been bypassed and repair accordingly. | 07/2014 | Scott |
| Perfekta | There is no point of operation protection for the operators using the press brakes in this area (Photo 22). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Consider the installation of programmable laser light curtains on the press brakes so that the light curtain can be used during the down stroke of the press. An alternative would be to use tools designed for holding small parts. The tools should be made of malleable metal and designed for use on brake presses. A few examples are shown in Example Photo 2. | 02/2017 | Scott |
| Perfekta | The press brakes in this area do not have any side guard protection to prevent non-operator personnel from reaching the point of operation (Photo 23). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Fabricate and install a side guard screen or shield on each machine similar to the ones shown in Example Photos 3 and 4. The guards can be mounted on hinges to fold back out of the way during tool changes. | 02/2017 | Scott |
| E-ONE | An operator was observed using the Cincinnati brake press with the hinged guard folded back so that there was no side guard protection to prevent non-operator personnel from reaching the point of operation (Photos 16, 17). With the guard in this position the protective laser light curtain is non-functional. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Ensure that the operators always operate brake presses with the guards in place and that they utilize the laser light curtains. | 05/2014 | Scott |
| U.S. Ambulance | An operator was observed using brake press BP04 without the protective laser light curtain. It was determined that the laser light curtain was not functional. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Repair the light curtain and ensure that the operators use the safety equipment provided. | 05/2014 | Scott |
| Kuhn | Both the 500 ton (Photo 35) and the 750 ton (Photo 36) hydraulic power presses have two-handed controls but they both can also be operated with a foot pedal. There is no point of operation protection for the operators when using the foot pedal. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Consider the installation of programmable laser light curtains (Example Photo 4), sliding interlocked gates, or removing the foot pedal from service on both of the hydraulic presses. | 03/2016 | Scott |
| Kuhn | Both the 500 ton (Photo 35) and the 750 ton (Photo 36) hydraulic power presses do not have any side guard protection to prevent non-operator personnel from reaching the point of operation. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Fabricate and install a side guard screen or shield on each machine similar to the ones shown in Example Photos 5 and 6. | 03/2016 | Scott |
| U.S. Ambulance | The lowest tubular guard rod has been removed from Shear SH02 allowing hand access to the cutting blade (Photo 18). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Repair or replace the shear guard. | 05/2014 | Scott |
| E-ONE | The adjustable guard loops on the shear are set too high allowing hand access to the cutting blade (Photo 21). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Lower the adjustable guard loops so that less than ¼ inch of space remains between the guard loops and the material being cut. | 05/2014 | Scott |
| Perfekta | The shear is not guarded from the rear to keep non-operator employees from reaching the point of operation (Photo 24). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Install a barrier at the rear of the machine. The barrier can be anything from a yellow chain (Example Photo 5) or other barrier mounted on pedestals to a fully enclosed cage such as indicated in Example Photo 6. | 02/2017 | Scott |
| ElDorado – KS | The press brake is not guarded from the rear or from the side to keep non-operator employees from reaching the point of operation (Photos 26, 27). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Install a barrier at the rear of the machine. The barrier can be anything from a yellow chain or other barrier (See Example Photo 4) mounted on pedestals to a fully enclosed cage (see Example Photo 5). Install a barrier on the side of the machine as indicated in Example Photos 6 and 7. | 10/2014 | Scott |
| Atlas Aerospace | It was reported that with management’s approval, the factory installed electrical safety interlocks for all of the CNC machines have been bypassed so that the machine will operate with the doors open, thus exposing employees to the point of operation on each machine. Employees could also be exposed to fragments if a tool or part were to break while the machine is in operation. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | The electrical safety interlocks for all CNC machines should be placed back into service. | 07/2014 | Scott |
| Atlas Aerospace | There are several pneumatic presses with no guarding at point of operation (see photo 2233). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Survey the facility and determine how many pneumatic presses need point of operation guards. OSHA allows for barrier guards, two-hand tripping devices, electronic safety devices, etc. | 5-9-18 | Curtis Leiker |
| Atlas Aerospace | Hydraulic press in Chrome Lab with no guarding at point of operation (see Photo 2244). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | OSHA allows for barrier guards, two-hand tripping devices, electronic safety devices, etc. | 5-9-18 | Curtis Leiker |
| Capps | The cover is missing on the flywheel bar slot on the small mechanical power press in the Hand Form Area (Photo 26) and the Fuel Tank Building (Photo 27) | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Install the original flywheel bar slot cover or fabricate a new one. The flywheel bar slot can be bolted shut, electrically interlocked or padlocked while the machine is in operation. | 06/2014 | Scott |
| Faultless | **Major** – The General Electric band saw has numerous pinch points that are not guarded properly exposing personnel to injury from the rotating wheels (Photos 24, 25). In addition, the saw blade itself is unguarded both above and below the table (Photos 26, 27). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii);  1910.213(i)(1) | Fabricate and install guards to protect personnel from the rotating band saw wheels. Appendix E contains information on the maximum width of the opening allowed from the point of hazard. Fabricate an adjustable guard that can be mounted on the saw blade support above the table so that the guard can be adjusted up and down depending on the thickness of the material being cut to guard the unused portion of the blade. Fabricate and install a fixed guard underneath the table to cover the saw blade. | 02/2015 | Scott |
| Atlas Aerospace | There are several band saw with no guarding at point of operation (see Photos 2251, 2260) | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Fabricate an adjustable guard that can be mounted on the saw blade support above the table so that the guard can be adjusted up and down depending on the thickness of the material being cut to guard the unused portion of the blade. | 5-9-18 | Curtis Leiker |
| Kice Industries | There are several drill presses that do not have point of operation machine guards (see Photos 2296, 2301, 2302). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Survey the facility and determine how many drill presses need point of operation guards. OSHA allows a flat, plastic shield on a flexible support, which can be attached to the drill press and moved into position when needed as an example. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | There are several drill presses that do not have point of operation machine guards (see Photo 2353). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Survey the facility and determine how many drill presses need point of operation guards. OSHA allows a flat, plastic shield on a flexible support, which can be attached to the drill press and moved into position when needed as an example. | 5-23-18 | Curtis Leiker |
| Kice Industries | Hydraulic presses do not have guards at point of operation (see Photos 2299, 2328). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | OSHA allows for barrier guards, two-hand tripping devices, electronic safety devices, etc. | 5-16-18 | Curtis Leiker |
| Kice Industries | One belt sander with machine guard below the work rest that has guard too low exposing belt sander (see Photo 2325). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Adjust moveable guard into place to ensure belt is guarded below work rest. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | Table saw has no guard (see Photo 2348) exposing employees to point of operation hazards. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Replace the guard, fabricate a new one, or replace the table saw. | 5-23-18 | Curtis Leiker |
| Hillsboro Industries | No guarding on punch area of the Piranha Ironworker machine (see Photo 2349). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Manufactured guards are available for the punch side of the machine. | 5-23-18 | Curtis Leiker |
| Kansas Ethanol | Machine guards over shafts to fire pump are wedged in under compression force but should be secured in place (see Photo 4). Guards should be affixed to the machine where possible and secured elsewhere if for any reason attachment to the machine is not possible. | 1910.212(a)(2) | Securely attach barrier guards to the shaft so they are not easily removable or could come loose. | 6-26-19 | Curtis Leiker |
| Kansas Ethanol | The dump point of the pellet line does not have full machine guarding at point of operation (see Photo 5). The point of operation of machines whose operations exposes employees to injury shall be guarded. | 1910.212(a)(3)(ii) | Install proper machine guard such as expanded metal cover barrier guarding over the top and side to side of the dump point. | 6-26-19 | Curtis Leiker |
| Hillsboro Industries | Hydraulic press brakes do not have guards at point of operation (see Photo 4256). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | OSHA allows for barrier guards, two-hand tripping devices, electronic safety devices, etc. Current industry standard for press brakes are laser active optical protective devices. Current systems can automatically adjust to tool changes. Example is AKAS III from Fiessler Electronik. | 7-10-19 | Curtis Leiker |
| Perfekta | Hydraulic press does not have point of operation guarding to protect employees during down cycle. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | OSHA allows for barrier guards, two-hand tripping devices, electronic safety devices, etc. | 8/16/19 | Curtis |
| Perfekta | There are several drill presses that do not have a point of operation machine guard. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Survey the facility and determine how many drill presses need point of operation guards. OSHA allows a flat, plastic shield on a flexible support, which can be attached to the drill press and moved into position when needed as an example. | 8/16/19 | Curtis |
| Excel Industries | Paint shaker in touch-up paint booth lacks adequate machine guarding. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Fabricate barrier guard or purchase new paint shaker designed with approved barrier guarding. | 12-2-19 | Curtis |
| Global Parts | Paint shaker in touch-up paint booth lacks adequate machine guarding (See Photo 11). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Fabricate barrier guard or purchase new paint shaker designed with approved interlocked barrier guarding. Interlock system required if using moveable barrier guard. | 8-19-21 | Curtis |
| MPM | There is a belt sander in which the safety guards protecting the spindle, belt, or drive pulley are missing (See Photo 37). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Replace the original guards, fabricate new guards, or replace the machines. The only portion of the belt that may be exposed is the working portion of the belt on the front side. | 8-23-21 | Curtis |
| MPM | Hydraulic press brake does not have guards at point of operation (See Photo 38). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | OSHA allows for barrier guards, two-hand tripping devices, electronic safety devices, etc. Current industry standard for press brakes are laser active optical protective devices. Current systems can automatically adjust to tool changes. Example is AKAS III from Fiessler Electronik. | 8-23-21 | Curtis |
| Global Parts | Lathe does not a point of operation chuck guard attached on machine (See Photo 16) to cover the rotating chuck and point of operation. A chip/coolant shield would need to be provided IF the material is striking the operator. | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Install a moveable plastic guard to cover the chuck, and if necessary a chip/coolant shield if material is striking the operator. See Appendix J. | 8-19-21 | Curtis |
| Global Parts | Pallet wrapper does not have adequate machine guarding at the point of operation of the wrapping (See Photo 17). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Erect a barrier guard around the perimeter of the equipment and install presence sensing devices (light curtain, laser scanner, etc.) at the entrance of the wrapper. | 8-19-21 | Curtis |
| Pet-Ag | Pallet wrappers do not have adequate machine guarding at the point of operation of the wrapping (See Photo 14). | 1910.212(a)(1);  1910.212(a)(2);  1910.212(a)(3)(i) and (ii) | Erect a barrier guard around the perimeter of the equipment and install presence sensing devices (light curtain, laser scanner, etc.) at the entrance of the wrapper. | 9-14-21 | Curtis |
| Kice | There are several fans used for cooling in which the screen guard for the fan blades is too big (Photo 14). When the periphery of the blades of a fan is less than seven (7) feet above the floor or working level, the blades shall be guarded. The guard shall have openings no larger than one-half (½) inch. | 1910.212(a)(5) | Survey the facility and determine how many fans are in use with this type of fan guard. Install a smaller sized mesh on the fans so that the opening is ½ inch or less. | 03/2017 | Scott |
| Perfekta | There are numerous fixed machines that are not securely mounted to the floor or the bench top. A few examples are: 480 East - Deburr Shop drill press (Photo 25), North dock Rockwell band saw (Photo 29), Maintenance Shop drill press (Photo 26) and Maintenance Shop grinder (Photo 30). | 1910.212(b) | Survey the facility and securely anchor this equipment and any other machines in a fixed location to prevent “walking” during operation. | 02/2017 | Scott |
| HOC Industries | Drill press was not securely mounted to the floor (see Photo 3581). Machines designed for a fixed location shall be securely anchored to prevent walking or moving. | 1910.212(b) | Securely anchor drill press to prevent walking or moving during operation. | 5-28-19 | Curtis |
| Hillsboro Industries | Grinders (see Photo 20) drill presses (see Photo 21) are not securely mounted to the floor and bench. Machines designed for a fixed location shall be securely anchored to prevent walking or moving. | 1910.212(b) | Securely anchor grinders and drill presses to prevent walking or moving during operation. | 6-17-21 | Curtis |
| MPM | Drill press was not securely mounted to the floor (See Photo 42). Machines designed for a fixed location shall be securely anchored to prevent walking or moving. | 1910.212(b) | Securely anchor drill press to prevent walking or moving during operation. | 8-23-21 | Curtis |
| Pet-Ag | Drill press was not securely mounted to the floor (See Photo 15). Abrasive wheel grinder was not in use at the time of the audit, but needs to be secured as well if put in use. Machines designed for a fixed location shall be securely anchored to prevent walking or moving. | 1910.212(b) | Securely anchor drill press and abrasive wheel grinder to prevent walking or moving during operation. See Appendix F. | 9-14-21 | Curtis |
| Perfekta | The guard on the table saw in the Maintenance Shop has been removed (Photo 31) exposing the operator to cut hazards. | 1910.213(c)(1);  1910.213(c)(2);  1910.213(c)(3) | Replace the guard, fabricate a new one, or replace the table saw. | 02/2017 | Scott |
| MPM | The guard on the table saw has been removed (See Photo 43) exposing the operator to cut hazards. | 1910.213(c)(1);  1910.213(c)(2);  1910.213(c)(3) | Replace the guard, fabricate a new one, or replace the table saw. | 8-23-21 | Curtis |
| BG Products Wichita | The table saw does not have nonkickback fingers or dogs so located as to oppose the thrust or tendency of the saw to pick up the material or to throw it back toward the operator. They shall be designed to provide adequate holding power for all the thicknesses of materials being cut. | 1910.213(c)(3) |  | 01/2018 | Scott |
| NPC | Radial saw is missing self-adjusting machine guarding around the blade (See Photo 12). The saw must have a guard that automatically adjusts to completely enclose the portion of the saw above the table and above the material being cut. | 1910.213(d)(1) | Either replace retractable guard or purchase new saw that is fully guarded. | 3-22-22 | Curtis |
| Tank Connection East | A radial arm saw is being used in which the protective guard is malfunctioning and does not adequately cover the upper portion of the saw blade (Photo 13). | 1910.213(h)(1) | The saw should be tagged as out of service until the saw blade guard is repaired or replaced. | 02/2013 | Scott |
| Electromech | The Chicago radial arm saw in this area does not have an auto return sufficient enough to return the blade to the starting position when released by the operator (Photo 48). | 1910.213(h)(4) | Either shim the front edge of the saw so that blade retracts automatically or install a return spring. | 11/2015 | Scott |
| Kuhn | The Do-All band saw blade is not guarded on the underside of the table (Photo 44). All portions of the saw blade shall be enclosed or guarded, except for the portion of the blade between the bottom of the guide rolls and the top of the table. | 1910.213(i)(1) | Fabricate a guard and install it on the exposed portion of the blade under the table of this saw. A fabricated guard is shown in Example Photo 12. | 03/2016 | Scott |
| E-ONE | **Moderate** – The Jet wood band saw blade is not guarded on the underside of the table (Photo 2655). All portions of the saw blade shall be enclosed or guarded, except for the portion of the blade between the bottom of the guide rolls and the top of the table. | 1910.213(i)(1) | Fabricate a guard and install it on the exposed portion of the blade under the table of this saw. | 04/2015 | Scott |
| TECT Aerospace | The router table router bit is not guarded at the point of operation (Photo 45) | 1910.213(m)(1) | Install adjustable guard on the cutting head on all router equipment. Ensure that all cutting heads are lowered beneath the table level when the machine is not in use. | 05/2014 | Scott |
| Bombardier | Moderate Non-Conformance - Building 7 Upholstery Shop: Pedestal disk sander (no number) does not have guard on working face of sander (Photo 20). | 1910.213(p)(3) | Guard sander face with Plexiglas shield similar to other sanders within facility. | 04/2012 | Scott |
| Electromech | The Baldor pedestal grinder does not have a rest plate to support the work on the left side of the grinder (Photo 46). | 1910.215(a)(4) | Install rest plate on grinder and ensure that it is adjusted to within 1/8 inch of the grinding wheel. | 11/2015 | Scott |
| Electromech | The gap between the left side grinder wheel and the rest plate on the DeWalt pedestal grinder is more than the maximum allowed 1/8 inch. | 1910.215(a)(4) | As the diameter of the grinding wheel decreases due to wear, adjust the work rest to within 1/8 inch of the wheel. | 11/2015 | Scott |
| Figeac | The gap between the right side adjustable tongue guard and the grinder wheel of the bench grinder in Assembly is greater than the maximum allowed 1/4 inch (Photo 507). | 1919.215(b)(9) | As the diameter of the grinding wheel decreases due to wear, the guard should be adjusted to within 1/4 inch of the grinding wheel. | 01/2018 | Scott |
| Perfekta | The gap between the pedestal grinder wheels and the work rest plate is more than the maximum allowed 1/8 inch in the following areas: 480 East – Maintenance Shop (both sides of grinder)(Photo 32); 707 Building – (right side only)(Photo 33). In addition, the adjustable tongue guards are set too high and therefor the grinder wheels are more than the maximum allowed 1/4 inch from the tongue guard in the 480 East Maintenance Shop (both sides)(Photo 34) and the 707 Building (both sides)(Photo 35). | 1910.215(a)(4);  1910.215(b)(9) | As the diameter of the grinding wheel decreases due to wear, adjust the work rest to within 1/8 inch of the wheel and keep the adjustable tongue guard on the top side of grinder to within 1/4 inch of wheel. Replace grinder wheel if work rest and tongue guard cannot be adjusted to these requirements. | 02/2017 | Scott |
| Hillsboro Industries | The abrasive wheel grinder has its work rest more than 1/8” from the wheel and top guard is missing which shall never exceed 1/4" from wheel (see Photo 2352). | 1910.215(a)(4);  1910.215(b)(9) | As the diameter of the grinding wheel decreases due to wear, adjust the work rest to within 1/8 inch of the wheel and keep the adjustable tongue guard on the top side of grinder to within 1/4 inch of wheel. | 5-23-18 | Curtis Leiker |
| Vermillion | The abrasive wheel grinder has its work rest more than 1/8” from the wheel and top guard more than 1/4" from wheel (see Photo 2504). | 1910.215(a)(4);  1910.215(b)(9) | As the diameter of the grinding wheel decreases due to wear, adjust the work rest to within 1/8 inch of the wheel and keep the adjustable tongue guard on the top side of grinder to within 1/4 inch of wheel. | 7-23-18 | Curtis Leiker |
| Perfekta | The abrasive wheel grinder is missing its adjustable guards, thus not allowing the work rest plate to be less than the maximum allowed 1/8 inch and the top guard to be less than the maximum allowed 1/4 inch. | 1910.215(a)(4);  1910.215(b)(9) | Install proper adjustable guards on the grinder and set the guards as necessary. | 8/16/19 | Curtis |
| Collins Bus | **Major** – The key is left in the mode selection switch on the power press (Machine 828) allowing employees to turn the selector to Off, Inch, or Run. OSHA requires that the fixing of selection shall be by means capable of supervision by the employer. | 1910.217(b)(7)(iii) | Require that the supervisor maintain control of the key so that employees cannot change the mode selection. | 02/2015 | Scott |
| TECT Aerospace | The two-hand trip buttons on the hydraulic press P3315 are placed too close together (Photo 50). The machine can be operated by pushing the trip buttons with one hand, allowing the free hand to enter the machine during operation. | 1910.217(b)(7)(v)(a) | Relocate the two-hand trip buttons so that both hands are required to trip the press. | 05/2014 | Scott |
| TECT Aerospace | The key for the clutch/brake mode control was left in the operator selection switch (Photo 51). OSHA requires that the employer supervise those clutch/brake control systems which contain both single and continuous functions. The initiation of continuous runs shall require a prior action or decision by the operator in addition to the selection of Continuous on the stroking selector, before actuation of the operating means will result in continuous stroking. Leaving the key in the mode selector is not considered proper supervision. | 1910.217(b)(7)(vii);  1910.217(b)(7)(viii) | Keep the key for the mode selector in the supervisor’s possession or office. Operators should be required to retrieve the key from the supervisor if needed. | 05/2014 | Scott |
| Capps | The mechanical power presses (Photos 34, 35) do not have point of operation guarding for operators. | 1910.217(c)(1)(i);  1910.217(c)(2)(i)(a) thru (f)  1910.217 Table O-10 | Install appropriate guards for the presses. Some options for full revolution clutches are fixed guards, pullback devices, restraint devices, or “A” type gates. For partial revolution clutch machines the list is the same except “B” type gates are allowed and light curtains are allowed. | 06/2014 | Scott |
| Electromech | The mechanical power press guard on the upper left portion of the machine is inadequate allowing the operator to reach the point of operation (Photo 52). | 1910.217(c)(1)(i);  1910.217(c)(2)(i)(a);  1910.217 Table O-10 | Modify the guard so that it will prevent entry of the hands or fingers into the point of operation by reaching through, over, under or around the guard. Appendix H contains information on the maximum width of the opening allowed from the point of hazard. | 11/2015 | Scott |
| NPC | There are several horizontal power transmission shafts that are not sufficiently guarded and therefore expose employees to pinch points. A couple of examples are: Line 6 (Photos 6, 7) and Line 2 (Photos 8, 9). All exposed parts of horizontal shafting seven (7) feet or less from floor or working platform shall be protected by a stationary casing enclosing shafting completely | 1910.219(c)(2)(i) | Fabricate and install guards to protect pinch points on the equipment indicated. Need to survey the facility and determine equivalent machinery guarding deficiencies. | 07/2014 | Scott |
| Pet-Ag | There are several horizontal power transmission shafts that are not sufficiently guarded and therefore expose employees to pinch points near the depalletizer (See Photo 2). All exposed parts of horizontal shafting seven (7) feet or less from floor or working platform shall be protected by a stationary casing enclosing shafting completely. Although the shafts are above seven feet from the main floor, the working platform for the palletizer is only 6.5 feet from the exposed parts. | 1910.219(c)(2)(i) | Fabricate and install guards to protect pinch points on the equipment indicated. | 5-25-2022 | Curtis |
| NPC | The conveyor belt projecting shaft end on the equipment indicated in Photo 6 is not guarded sufficiently. Projecting shaft ends shall present a smooth edge and the end shall not project more than one-half the diameter of the shaft unless guarded by nonrotating caps or safety sleeves. For example, a two-inch diameter shaft can only project out one inch. | 1910.219(c)(4);  1910.219(c)(4)(i) | Conduct a survey of the facility to determine how many shafts need to have guards added and install guarding as needed. | 12/2013 | Scott |
| Faultless | **Moderate** – There is a power transmission belt and pulley on the General Electric band saw that is unguarded on the back side (Photo 30). Pulleys, any parts of which are seven (7) feet or less from the floor or working platform, shall be guarded in accordance with the standards. | 1910.219(d)(1) | Fabricate and install a guard on the back side of the belt and pulley to protect nip points on the equipment indicated. | 02/2015 | Scott |
| Hillsboro Industries | There is a power transmission belt pulley on the table saw that is unguarded underneath the working surface (see Photo 23). Pulleys, any parts of which are seven (7) feet or less from the floor or working platform, shall be guarded in accordance with the standards. | 1910.219(d)(1) | Fabricate and install a guard on the belt and pulley to protect nip points on the equipment indicated. | 6-17-21 | Curtis |
| Vermilion | There are numerous locations where power driven gears, sprockets, and chains for machinery are unguarded. All gears, sprocket wheels and chains shall be enclosed unless they are more than seven (7) feet above the floor or platform. A few examples are Photos 3112, 3109, 3110, 3113, 3128). | 1910.219(f)(1);  1910.219(f)(1)(i) thru (iii);  1910.219(f)(3) | Fabricate guards to enclose all gears, sprockets, and chains. | 09/2015 | Scott |
| **Subpart P – Hand and Portable Powered Tools and Other Hand-Held Equipment** | | | | | |
| Perfekta | There are several air nozzles in use in which it appears that the nozzles have been modified so that the air pressure is not regulated to the OSHA maximum of 30 psi. Typically, OSHA approved air nozzles have a pressure relief hole in the side of the outlet nozzle to keep the pressure below 30 psi. A few examples are: 480 East – Deburr Shop (Photo 36), (Photo 37), Material Storage Area (Photo 38). | 1910.242(b) | Provide OSHA compliant air nozzles for use when blowing off parts and equipment and ensure that existing air nozzles are not altered from the original design. | 02/2017 | Scott |
| Kice Industries | There are several air nozzles in use in which it appears that the nozzles have been modified so that the air pressure is not regulated to the OSHA maximum of 30 psi (see Photos 2312, 2317). Typically, OSHA approved air nozzles have a pressure relief hole in the side of the outlet nozzle to keep the pressure below 30 psi when dead-ended. | 1910.242(b) | Provide OSHA compliant air nozzles for use when blowing off parts and equipment and ensure that existing air nozzles are not altered from the original design. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | There are several air nozzles in use in which it appears that the nozzles have been modified so that the air pressure is not regulated to the OSHA maximum of 30 psi (see Photo 2354). Typically, OSHA approved air nozzles have a pressure relief hole in the side of the outlet nozzle to keep the pressure below 30 psi when dead-ended. | 1910.242(b) | Provide OSHA compliant air nozzles for use when blowing off parts and equipment and ensure that existing air nozzles are not altered from the original design. | 5-23-18 | Curtis Leiker |
| Vermillion | There is a nozzle in use in which it appears that the nozzles have been broken so that the air pressure is not regulated to the OSHA maximum of 30 psi (see Photo 2507). Typically, OSHA approved air nozzles have a pressure relief hole in the side of the outlet nozzle to keep the pressure below 30 psi when dead-ended. | 1910.242(b) | Provide OSHA compliant air nozzles for use when blowing off parts and equipment and ensure that existing air nozzles are not altered from the original design. | 7-23-18 | Curtis Leiker |
| Kansas Ethanol | Air nozzle in use in which it appears that the nozzle has been modified or broken so that the air pressure is not regulated to the OSHA maximum of 30 psi (see Photo 2882). Typically, OSHA approved air nozzles have a pressure relief hole in the side of the outlet nozzle to keep the pressure below 30 psi. | 1910.242(b) | Provide OSHA compliant air nozzles for use when blowing off parts and equipment and ensure that existing air nozzles are not altered from the original design. | 11-7-18 | Curtis |
| Perfekta | There are several air nozzles in use in which it appears that the nozzles have been modified so that the air pressure is not regulated to the OSHA maximum of 30 psi. Typically, OSHA approved air nozzles have a pressure relief hole in the side of the outlet nozzle to keep the pressure below 30 psi when dead-ended. | 1910.242(b) | Provide OSHA compliant air nozzles for use when blowing off parts and equipment and ensure that existing air nozzles are not altered from the original design. | 8/16/19 | Curtis |
| MPM | Compressed air nozzle in use in which it appears that the nozzle has been modified or broken so that the air pressure is not regulated to the OSHA maximum of 30 psi (See Photo 44). Typically, OSHA approved air nozzles have a pressure relief hole in the side of the outlet nozzle to keep the pressure below 30 psi. | 1910.242(b) | Provide OSHA compliant compressed air nozzles for use when blowing off parts and equipment and ensure that existing air nozzles are not altered from the original design. | 8-23-21 | Curtis |
| Barkman Honey | There is a compressed air nozzle in use in which it appears that the nozzle is not regulated to the OSHA maximum of 30 psi or fitted with a relief device that drops the pressure to less than 30 psi if the flow is dead ended (See Photo 8). | 1910.242(b) | Provide OSHA compliant compressed air nozzles for use when blowing off parts and equipment and ensure that existing air nozzles are not altered from the original design. | 2-11-22 | Curtis |
| Excel Industries | An employee was observed using compressed air to blow off in the powder paint booth. OSHA does not allow compressed air for cleaning employees or their clothing in general industry situations. The eyes and other body parts, such as the respiratory system, may be damaged as the result of inadequate personal protective equipment, lack of chip guards, and/or uncontrolled release of compressed air. | 1910.242(a)  1910.242(b)  LOI 1-14-1994 | Jet black cleaning stations are already provided for employee use allowing for safe removal of dust from clothing and personnel. Enforce current policy and consider disciplinary action and retraining of the employees. | 12-2-19 | Curtis |
| Capps | There is a hand held portable grinder in use that does not have a guard around the grinding surface (Photo 37). A guard is required unless the grinding wheel is 2 inches or less in diameter | 1910.243(c)(1);  1910.243(c)(1)(i)(b);  1910.243(c)(1)(ii)(a) | Replace the grinder guard or take the hand held grinder out of service. | 06/2014 | Scott |
| NPC | There is a hand held portable grinder in use that does not have a guard around the grinding surface (See Photo 8). All portable grinders must have a maximum exposure angle of 180 degrees and the guard shall be located so as to be between the operator and the wheel during use. | 1910.243(c)(3) | Install proper guard on tool or replace with a new tool with compliant safety guard. | 9-28-22 | Curtis |
| Kuhn | The facility does not have an inspection program in place for hydraulic jacks. Hydraulic jacks are required to be inspected no less than every 6 months. | 1910.244(a)(2)(vi);  1910.244(a)(2)(vi)(A thru C) | Implement an inspection process for all facility hydraulic jacks. A sample inspection form is included as Appendix N. | 03/2016 | Scott |
| USD 259 | The facility does not have an inspection program in place for hydraulic floor jacks. Hydraulic floor jacks are required to be inspected no less than every 6 months. | 1910.244(a)(2)(vi);  1910.244(a)(2)(vi)(A thru C) | Implement an inspection process for all facility hydraulic floor jacks. A sample inspection form is included as Appendix K. | 7/30/2018 | Scott Smith |
| **Subpart Q – Welding, Cutting, and Brazing** | | | | | |
| Champion Bus | **Major** – There are numerous areas where flammable material is placed too close to welding areas. Some examples are: Maintenance Shop - Flammable liquid cabinet (Photo 47), Paint on shelving (Photo 48); Off Line Welding – Flammable liquid cabinet (Photo 49); Insulation Spray Area – Open diesel tank (Photo 50); R&D; Lamination Area – Glue spraying (Photo 51). All flammable and combustible materials must be a minimum of 35 feet from welding operations. | 1910.252(a)(1)(i) thru (iii) | Move all flammable material so that it is a minimum of 35 feet from welding areas. | 03/2015 | Scott |
| HOC | Hot work operations are taking place on wood floors. Combustible floors shall be kept wet, covered with damp sand, or protected by fire-resistant shields before cutting or welding takes place. | 1910.252(a)(2)(v) | Combustible floor material should either be replaced by non-combustible material or properly shielded during hot work operations. | 5/28/19 | Curtis |
| Allied Labs | The propane torches are being stored against combustible material (Photos 40, 41) | 1910.252(a)(2)(vi)(D) | Disassemble the propane torch and store the fuel in a flammable storage cabinet and the torch head in a location away from combustible material. | 04/2013 | Scott / Keith |
| BG Products | Designated hot work area needs to minimize the number of combustible materials stored in area within 35 feet of hot work. Observed were several cardboard boxes in the area. | 1910.252(a)(2)(vii) |  | 7-27-21 | Curtis |
| PBI Gordon – Jayhawk | Maintenance personnel on occasion weld or perform other hot work on equipment outside of the maintenance shop. There are no hot work procedures in place to ensure the elimination of hazards prior to hot work. | 1910.252(a)(2)(xiii)(A) thru (D) | Establish a written hot work program that meets the requirements of 1910.252 to be used when performing hot work outside of the maintenance shop. | 05/2013 | Scott |
| Kuhn | There is no protection from arc welding rays for forklift operators or pedestrians in the main aisles around any of the facility welding stations. Workers or other persons adjacent to the welding areas shall be protected from the rays by noncombustible or flameproof screens or shields or shall be required to wear appropriate goggles. | 1910.252(b)(2)(iii) | Install permanent or portable welding screens around all welding operations where feasible. Screens shall permit circulation of air at floor level. | 03/2016 | Scott |
| Hillsboro Industries | There is no protection from arc welding rays for forklift operators or pedestrians in the aisles around any of the facility welding stations. Workers or other persons adjacent to the welding areas shall be protected from the rays by noncombustible or flameproof screens or shields or shall be required to wear appropriate goggles. | 1910.252(b)(2)(iii) | Install permanent or portable welding screens with low finish of reflectivity such as zinc oxide and lamp black or other screens similarly painted around all welding operations where feasible. Screens shall permit circulation of air at floor level. | 6-17-21 | Curtis |
| BG Products | Robot welder needs shaded glasses for being in same viewing area as robotic welding | 1910.252(b)(2)(iii) |  | 7-27-21 | Curtis |
| Allied Labs | Air monitoring has not been conducted for any hot work operations to determine if employees are being overexposed. | 1910.252(c) | Add designated hot work areas to Industrial Hygiene Sampling Plan to document exposure values. | 04/2013 | Scott / Keith |
| Collins Bus | **Minor** – The oxygen / acetylene welding rig in this area is rarely used. Hoses on torch and welder units are connected while not in use. OSHA considers a cylinder to be in use only when gas is being drawn or it is reasonably anticipated that gas will be drawn from the cylinder within 24 hours. | 1910.253 (b)(2)(iv);  1910.253 (b)(5)(ii)(g) | Ensure that hoses are bled down, disconnected, and the valve protection caps are in place whenever the welding rig will not be used for 24 hours including overnight hours. | 02/2015 | Scott |
| E-ONE | **Moderate** – Oxygen cylinders are stored too close to acetylene cylinders (Photo 2664). OSHA regulations require that a minimum distance of 20 feet be maintained between stored oxygen cylinders and fuel-gas cylinders, or the cylinders must be separated by a noncombustible barrier at least 5 feet (1.5 m) high having a fire-resistance rating of at least one-half hour. | 1910.253(b)(4)(i);  1910.253(b)(4)(iii) | Either separate the oxygen and acetylene cylinders in this location by 20 feet or install a suitable barrier. An engineer should design the barrier to ensure it meets the one-half hour fire rating. | 04/2015 | Scott |
| ATC | The work cable on the Thermal Dynamic Cutmaster 38 in the Maintenance Shop is frayed and has damaged insulation. (Photo 36) | 1910.254(d)(9)(iii) | Repair or replace the damaged cable. | 10/2014 | James |
| Hillsboro Industries | Cables with damaged insulation were not replaced exposing employees to electrical hazards (see Photo 2361). | 1910.254(d)(9)(iii)  Letter of Interpretation 04/05/2005 | Replace (do not repair) damaged welding lead. | 5-23-18 | Curtis Leiker |
| U.S. Ambulance | **Minor** – One of the cylinder gauge faces is broken on the nitrogen cylinder located in Main Assembly, Station 1 next to Rack 6 (Photo 2705). In addition, both of the gauges are broken on the oxygen bottle sitting on the welding cart in the Maintenance Tent are broken (Photo 2728). | 1910.253(e)(1) | Purchase and install new gauge faces for the broken gauges. | 04/2015 | Scott |
| **Subpart S - Electrical** | | | | | |
| Ametek | The electrical insulation is damaged on the dovetail machine (Photo 28). | 1910.303(b)(1);  1910.303(b)(1)(iv) | Have a licensed electrician replace the electrical cord with a new one. | 08/2014 | Scott/James |
| Tank Connection East | There are some exposed wires protruding from a conduit (Photo 17). It is unclear whether these wires are live or not. | 1910.303(b)(1);  1910.303(b)(1)(iv) | Have a licensed electrician determine if these wires are live or not and either cap them and place inside an electrical junction box or remove them from service. | 02/2013 | Scott |
| NPC Valley Center | The conduit on the Line 7 Bulk Bagger 3 has separated exposing wires which could cause a shock hazard to employees. | 1910.303(b)(1);  1910.303(b)(1)(iv) | Connect the two pieces of conduit. | 10-9-18 | Curtis Leiker  Scott Smith |
| Kice Industries | The electrical insulation is damaged on cord to light within storage cabinet. | 1910.303(b)(1) | Have a licensed electrician replace the electrical cord with a new one or simply discard equipment. | 5-16-18 | Curtis Leiker |
| NPC | Electrical sheath was pulled off electrical cord exposing electrical wire on Line 6 (see Photo 10). | 1910.303(b)(1);  1910.303(b)(1)(iv) | Repair or replace damaged cord. | 4-23-21 | Curtis |
| NPC | An accumulation of water on the floor was present in the electrical room next to the Line 12 processing line creating electrical shock hazards for employees who are required to work and walk in this area. | 1910.303(b)(1)(viii) | Instruct employees to stop water leaks as soon as practicable and put down spill containment material to prevent water from entering the electrical room. | 4-23-21 | Curtis |
| NPC | There were three electrical panel doors fastened by non-Underwriters Laboratories (UL) rated equipment (Photos 15, 16, and 17). | 1910.303(b)(2) | Replace electrical panel covers with UL rated equipment. | 04/2017 | Ben |
| Atlas Aerospace | Listed or labeled electrical equipment was no used or installed in accordance with instructions included in the listing or labeling. A relocatable power tap had two extension cords plugged in series into it powering a fan (see Photo 2239.) | 1910.303(b)(2) | Eliminate the use of the relocatable power tap to power the fan. They are not intended for use with high load equipment such as refrigerators, coffee pots, space heaters, microwave ovens, toaster, toaster ovens, fans and shop equipment. | 5-9-18 | Curtis Leiker |
| Kice Industries | Listed or labeled electrical equipment was no used or installed in accordance with instructions included in the listing or labeling. A relocatable power tap was plugged in series with an extension cord that were then powering drills (see Photo 2313.) | 1910.303(b)(2) | Eliminate the use of the extension cord and relocatable power tap to power the drills. Relocatable power taps are not intended for use with high load equipment such as refrigerators, coffee pots, space heaters, microwave ovens, toaster, toaster ovens, fans and shop equipment. | 5-16-18 | Curtis Leiker |
| Vermillion | Relocatable power taps designed and listed to be relocatable where found to be securely attached to industrial racking (see Photo 2498). Relocatable power taps are not intended to be permanently secured to building structures, tables, work benches or similar structures, nor are they intended to be used as a substitute for fixed wiring. | 1910.303(b)(2) | Ensure all relocatable power taps are not secured in place and able to move without tools. | 7-23-2018 | Curtis Leiker |
| Vermillion | Listed or labeled electrical equipment was not used or installed in accordance with instructions included in the listing or labeling. A relocatable power tap was powering a bag sealer and heat gun (see Photo 2501.) | 1910.303(b)(2) | Eliminate the use of the relocatable power tap to power the high power equipment. Relocatable power taps are not intended for use with high load equipment such as refrigerators, coffee pots, space heaters, microwave ovens, toaster, toaster ovens, fans and shop equipment. | 7-23-18 | Curtis Leiker |
| Vermillion | Listed or labeled electrical equipment was no used or installed in accordance with instructions included in the listing or labeling. A relocatable power tap was plugged in series with an extension cord (see Photo 2508). | 1910.303(b)(2) | Survey the facility for extension cords being used as permanent wiring and have a licensed electrician hard wire electrical outlets in place as needed. | 7-23-18 | Curtis Leiker |
| Kansas Ethanol | Listed or labeled electrical equipment was not used or installed in accordance with instructions included in the listing or labeling. Several relocatable power tap are powering freezers in the MCC room (see Photo 2885). | 1910.303(b)(2)  Letter of Interpretation 11-18-02 | Eliminate the use of relocatable power taps to power the high power equipment. Relocatable power taps are not intended for use with high load equipment such as refrigerators, coffee pots, space heaters, microwave ovens, toaster, toaster ovens, fans and shop equipment. | 11-7-18 | Curtis Leiker |
| Perfekta |  |  |  | 8/16/19 | Curtis |
| MPM | Rags are being used to cover the electrical outlets to prevent metal shavings from coming into contact with the electrical circuits (See Photo 45). OSHA generally requires that all certified electrical equipment be installed and used in accordance with instructions included in the listing, labeling, or certification. | 1910.303(b)(2) | Install designed covers on the electrical outlets that use an in-use cover that allows for electrical equipment to be plugged in and full protection from metal shavings from contacting the live parts of the circuit. Install barriers that do not come into contact with the electrical equipment to prevent metal shavings in other areas. | 8-23-21 | Curtis |
| Atlas | The panel cover for the electrical panel is missing (Photo 11). | 1910.303(b)(7)(i) | Replace the electrical panel cover. | 08/2012 | Scott |
| Cantrell | The electrical panel door latch is broken on three panels so that the doors do not remain closed (Photo 38). | 1910.303(b)(7)(i) | Replace the broken circuit panel door latches. | 06/2013 | Scott |
| Figeac | The front panel cover on Panel LP-1 on the north wall has been pulled out exposing personnel to electrical shock (Photo 22). There shall be no damaged parts that may adversely affect safe operation or mechanical strength of the equipment, such as parts that are broken, bent, cut, or deteriorated by corrosion, chemical action, or overheating. | 1910.303(b)(7)(iv) | Repair or replace the bent electrical panel cover. | 01/2018 | Scott |
| General OSHA Citation | Markings were not provided on electrical equipment giving voltage, current, wattage, and other ratings as necessary. | 1910.303(e)(1)(ii) | FROM GEAPS WEBINAR from 2012 citation. | 4-26-19 | Curtis |
| Ultra Clean Midwest | Markings were not provided on electrical equipment giving voltage, current, wattage, and other ratings as necessary (See Photo 8716). | 1910.303(e)(1)(ii) | Have a licensed electrician inspect the equipment and apply all necessary labeling to identify the voltage and any other necessary information on the panels to ensure an electrical worker would know what PPE is needed to work on the electrical equipment. | 12-8-21 | Curtis |
| Kice Industries | Electrical panel has several disconnects in use that were not labeled (see Photo 2294). Each disconnecting means shall be legibly marked to indicate its purpose, unless located and arranged so the purpose is evident. | 1910.303(f) | Apply markings to unlabeled disconnects that are durable to withstanding the environment involved. | 5-16-18 | Curtis |
| Hillsboro Industries | Electrical panel has several disconnects in use that were not labeled (see Photo 4242). Each disconnecting means shall be legibly marked to indicate its purpose, unless located and arranged so the purpose is evident. | 1910.303(f) | Apply markings to unlabeled disconnects that are durable to withstanding the environment involved. | 7-10-19 | Curtis |
| NPC | Electrical panels have disconnects in use that were not labeled (See Photo 10). Each disconnecting means shall be legibly marked to indicate its purpose, unless located and arranged so the purpose is evident. | 1910.303(f) | Apply markings to unlabeled disconnects that are durable to withstanding the environment involved. | 6-22-22 | Curtis |
| Perfekta | The minimum required area of clear space is not being maintained around the electrical panels in these areas: 480 East – Upstairs IT Room (Photo 39), Compressor Room (Photo 40), under the stairs in the 3-Axis Room (Photo 41), and Tool Crib (Photo 42). | 1910.303(g)(1);  1910.303(g)(1)(i);  1910.303(g)(1)(i)(A thru C); and  1910.303(g)(1)(ii) | An area 3 feet deep in front of the panel face and equal to the width of the panel or 30 inches wide (whichever is greater) must remain clear around all electrical panels to allow for access to the panel. | 02/2017 | Scott |
| Atlas Aerospace | The minimum required area of clear space is not being maintained around electrical panels (see Photo 2227, 2242, 2267, 2270). | 1910.303(g)(1);  1910.303(g)(1)(i);  1910.303(g)(1)(i)(A thru C)  1910.303(g)(1)(ii) | An area 3 feet deep in front of the panel face and equal to the width of the panel or 30 inches wide (whichever is greater) must remain clear around all electrical panels to allow for access to the panel. | 5-9-18 | Curtis Leiker |
| Kice Industries | The minimum required area of clear space is not being maintained around an electrical panel (see Photos 2316). | 1910.303(g)(1);  1910.303(g)(1)(i);  1910.303(g)(1)(i)(A thru C);  1910.303(g)(1)(ii) | An area 3 feet deep in front of the panel face and equal to the width of the panel or 30 inches wide (whichever is greater) must remain clear around all electrical panels to allow for access to the panel. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | The minimum required area of clear space is not being maintained around an electrical panel (see Photos 2350). | 1910.303(g)(1);  1910.303(g)(1)(i);  1910.303(g)(1)(i)(A thru C);  1910.303(g)(1)(ii) | An area 3 feet deep in front of the panel face and equal to the width of the panel or 30 inches wide (whichever is greater) must remain clear around all electrical panels to allow for access to the panel. | 5-23-18 | Curtis Leiker |
| iSi Laura | Combustible materials are being stored in the electrical room (Photo 10). | 1910.303(g)(1);  1910.303(g)(1)(i); 1910.303(g)(1)(i)(A thru C); 1910.303(g)(1)(ii);  1910.303(g)(1)(vii)(A)(2) | All combustible material should be removed from the electrical room. In addition, an area 3 feet deep in front of the panel face and equal to the width of the panel or 30 inches wide (whichever is greater) must remain clear around all electrical panels to allow for access to the panel. | 10/2012 | Scott / Ben |
| D-J Engineering | There is plastic sheeting stored on top of the electrical panel (Photo 4395). The space equal to the width and depth of the equipment shall be kept clear of foreign systems. This area shall extend from the top of the electric equipment to the structural ceiling; | 1910.303(g)(1)(vii)(A)(2) | Remove the plastic. | 12/2016 | Scott |
| NPC | The minimum required area of clear space is not being maintained around electrical equipment (see Photo 12). | 1910.303(g)(1);  1910.303(g)(1)(i);  1910.303(g)(1)(i)(A thru C)  1910.303(g)(1)(ii) | Remove material stored on top of transformer and ensure sufficient access and working space is provided and maintained. | 4-23-21 | Curtis |
| NPC | Two electrical panels were left in the open position (Photos 23 and 24). | 1910.303(g)(2);  1910.303(g)(2)(i) | Keep electrical panels closed unless servicing, examining, or conducting maintenance. | 03/2017 | Ben |
| MPM | An electrical panel was found without a suitable cover protecting the live parts (See Photo 48). | 1910.303(g)(2);  1910.303(g)(2)(i) | Replace cover on electrical panel and keep electrical panels closed unless servicing, examining, or conducting maintenance. | 8-23-21 | Curtis |
| NPC Valley Center | The concrete guard protecting the exterior wall of the Weigh Station electrical room has been struck multiple times causing the wall to be moved inward and rendering the access door useless (see Photo 24). In locations where electric equipment is likely to be exposed to physical damage, enclosures or guards shall be so arranged and of such strength as to prevent such damage. | 1910.303(g)(2)(ii) | Repair the wall and door and install suitable guards to protect the contents of the room. | 10-9-18 | Curtis Leiker  Scott Smith |
| Lubrication Engineers | The door to the electrical room is not placarded correctly (Photo 12). | 1910.303(g)(2)(iii) | The door the electrical room shall be marked with conspicuous warning signs forbidding unqualified persons to enter. | 03/2014 | Scott |
| Kice Industries | The door to the electrical room is not marked with proper warning sign (see Photo 3528). | 1910.303(g)(2)(iii) | The door the electrical room shall be marked with conspicuous warning signs forbidding unqualified persons to enter. | 5/14/19 | Curtis |
| Perfekta | The door to the electrical room is not marked with proper warning sign. | 1910.303(g)(2)(iii) | The door the electrical room shall be marked with a conspicuous warning sign forbidding unqualified persons to enter. | 8/16/19 | Curtis |
| NPC | Transformers on south side of building were missing appropriate warning signs. On entrances to all enclosures over 600 volts, permanent and conspicuous warning signs shall be provided, reading substantially as follows “DANGER – HIGH VOLTAGE – KEEP OUT” | 1910.303(h)(5)(iii)(B) | Place permanent warning signs on transformers that are appropriate to an outdoor environment. | 5-17-19 | Curtis |
| Nitride Solutions | There is an electrical outlet within 6 feet of the edge of the sink that is not a Ground Fault Circuit Interrupter (GFCI) type outlet (Photo 3616). | 1910.304(b)(3);  2011 NEC 210.8(B)(5) | Have a licensed electrician change the outlet to a GFCI outlet. | 06/2016 | Scott |
| Perfekta | The electrical outlet in the Men’s restroom is not a Ground Fault Circuit Interrupter (GFCI) outlet (Photo 43). All outlets in bathrooms must be GFCI type outlets. | 1910.304(b)(3)(i) | Replace the existing outlet with a GFCI outlet. Consider a survey of the facility to determine the need for GFCI outlets in other restrooms. | 02/2017 | Scott |
| Atlas Aerospace | There is an electrical outlet next to a handwashing sink within 6 feet that does not appear to be a Ground Fault Circuit Interrupter (GFCI) type outlet (see Photo 2216). | 1910.304(b)(3);  2017 NEC 210.8(A)(7) | Replace the existing outlet with a GFCI protected outlet. | 5/9/18 | Curtis |
| Kansas Ethanol | There are two electrical outlets next to a handwashing sink within 6 feet that do not appear to be a Ground Fault Circuit Interrupter (GFCI) type outlet (see Photo 2894). | 1910.304(b)(3);  2017 NEC 210.8(A)(7) | Replace the existing outlets with GFCI protected outlets. | 11-7-18 | Curtis |
| MPM | There are two electrical outlets next to a handwashing sink within 6 feet that do not appear to be a Ground Fault Circuit Interrupter (GFCI) type outlet (See Photo 49). | 1910.304(b)(3);  2020 NEC 210.8(A)(7) | Replace the existing outlet with GFCI protected outlets. | 8-23-21 | Curtis |
| Learjet – Tucson, AZ | (a) Hanger H: North end of hanger H was a scissor lift that had been inspected that morning however the ground prong was missing from the plug so the current was not permanent or continuous. | 1910.304(g)(5) | The path to ground from circuits, equipment, and enclosures shall be permanent, continuous, and effective. | 2020 | ADOSH |
| Ametek | The ground wire for the Mazak CNC machine is not connected (Photo 33). | 1910.305(a)(1)(i) | Have a licensed electrician connect the ground wire to a suitable earth ground. | 08/2014 | Scott/James |
| Perfekta | There is an area in which an extension cord is being used in lieu of permanent wiring (Photo 44). Temporary wiring can only be used 1). During and for remodeling, maintenance, or repair of buildings, structures, or equipment, and similar activities; 2). For a period not to exceed 90 days for Christmas decorative lighting, carnivals, and similar purposes; or 3). For experimental or development work, and during emergencies. | 1910.305(a)(2)(i)(A thru C) | Have a licensed electrician remove the extension cord and hard wire electrical outlets in place or use an overhead cable tray similar to the workstations set up to the south (Photo 45). | 02/2017 | Scott |
| Kice Industries | There are numerous instances in which an extension cord is being used in lieu of permanent wiring (see Photo 2300). Temporary wiring can only be used 1). During and for remodeling, maintenance, or repair of buildings, structures, or equipment, and similar activities; 2). For a period not to exceed 90 days for Christmas decorative lighting, carnivals, and similar purposes; or 3). For experimental or development work, and during emergencies. | 1910.305(a)(2)(i)(A thru C) | Survey the facility for extension cords being used as permanent wiring and have a licensed electrician hard wire electrical outlets in place as needed. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | There are numerous instances in which an extension cord is being used in lieu of permanent wiring (see Photo 2345). Temporary wiring can only be used 1). During and for remodeling, maintenance, or repair of buildings, structures, or equipment, and similar activities; 2). For a period not to exceed 90 days for Christmas decorative lighting, carnivals, and similar purposes; or 3). For experimental or development work, and during emergencies. | 1910.305(a)(2)(i)(A thru C) | Survey the facility for extension cords being used as permanent wiring and have a licensed electrician hard wire electrical outlets in place as needed. | 5-23-18 | Curtis Leiker |
| Kice Industries | Several instances of extension cords still plugged into outlets when not being used (see Photo 2303). Temporary wiring shall be removed immediately upon completion of the project or purpose for which the wiring was installed. | 1910.305(a)(2)(ii) | Instruct employees to unplug extension cords when not being used. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | Several instances of extension cords still plugged into outlets when not being used (see Photo 2362). Temporary wiring shall be removed immediately upon completion of the project or purpose for which the wiring was installed. | 1910.305(a)(2)(ii) | Instruct employees to unplug extension cords when not being used. | 5-31-18 | Curtis Leiker |
| Pegasus Labs | There are unguarded light bulbs in the light fixtures in the Maintenance Shop mezzanine storage area (Photo 31). | 1910.305(a)(2)(ix) | Install bulb guards on all light fixtures that are within 8 feet of the floor. The use of bulb sleeves is an acceptable alternate solution. | 08/2017 | Scott |
| Barkman Honey | There are fluorescent lights on the mezzanine that are not guarded (See Photo 65). | 1910.305(a)(2)(ix) | Install protective sheath covers over the fluorescent bulbs or provide another type of protective cover to prevent accidental breakage of the bulbs. | 2-16-22 | Curtis |
| Pet-Ag | There are fluorescent lights on the mezzanine that are not guarded from accidental contact or breakage by a suitable fixture or lamp holder with a guard (See Photo 5). | 1910.305(a)(2)(ix) | Install bulb guards on all light fixtures that are within 8 feet of the floor. The use of bulb sleeves is an acceptable alternate solution. See Appendix XX. | 5-25-22 | Curtis |
| Plant 5 | An electrical extension cord was run underneath a closed door without any protection (see Photo 2330). Flexible cords and cables shall be protected from accidental damage, as might be caused by sharp corners, projections, and doorways or other pinch points. | 1910.305(a)(2)(x) | If extension cord is needed to run through door, ensure door remains open or provide protection to cord with suitable cover. | 5-16-18 | Curtis Leiker |
| Tank Connection East | The conduit exiting the top of the electrical cabinet has become separated exposing the internal wires (Photo 22). | 1910.305(b)(1)(i) | Re-attach the conduit coupling to the conduit. | 02/2013 | Scott |
| Allied Recreation Group | **Major** – There is an opening above Breaker P11 on the B1 breaker panel which exposes personnel to live electrical wires (Photo 56) | 1910.305(b)(1)(ii) | Repair the hole in the panel. **Note**: Corrected after the audit. | 07/2015 | Scott |
| Hillsboro Industries | The electrical knockout is missing on junction box (see Photo 2360). | 1910.305(b)(1)(ii) | Cover the electrical knockout hole. | 5-23-18 | Curtis Leiker |
| NPC | Electrical conduit was not plugged at Line 7 (see Photo 3121). | 1910.305(b)(1)(ii) | Effectively close the open electrical conduit. | 2-7-19 | Curtis Leiker |
| Perfekta | The electrical knockout cover on the junction box above the electrical panel in the Material Storage Area is missing (Photo 46). | 1910.305(b)(2)(i) | Cover the electrical knockout hole. | 02/2017 | Scott |
| Boss Tank | The cover plate is missing from the electrical outlet (Photo 21) | 1910.305(b)(2)(i) | Replace missing electrical outlet cover plate. | 02/2013 | Scott |
| Building 4330 | An electrical knockout cover on junction box to light switch is missing (see Photo 2271). | 1910.305(b)(2)(i) | Cover the electrical knockout hole. | 5-9-18 | Curtis |
| Hillsboro Industries | Electrical cover is missing off junction box (see Photo 2358) and outlet box (see Photo 2357). | 1910.305(b)(2)(i) | Reattached suitable cover on junction box. | 5-23-18 | Curtis Leiker |
| Atlas Aerospace | Flexible electrical cord is taped to floor (see Photo 2222). Powering a workstation is not an approved use of a flexible cord and flexible cords are not allowed to be attached to building surfaces. | 1910.305(g)(1)  1910.305(g)(1)(iv)(D) | Rewire the electrical power in approved permanent fashion by a licensed electrician. | 5-9-18 | Curtis |
| Vermillion | Numerous extension cords were found being used in lieu of permanent wiring. Flexible cords and/or cables were used as a substitute for the fixed wiring of a structure. | 1910.305(g)(1)(iv)(A) | Survey the facility for extension cords being used as permanent wiring and have a licensed electrician hard wire electrical outlets in place as needed. | 7-23-18 | Curtis Leiker |
| Kice Industries | There are several instances in which an electrical extension cord is being used in lieu of fixed wiring (see Photo 3531). Flexible cords and/or cables shall not be used as a substitute for the fixed wiring of a structure. | 1910.305(g)(1)(iv)(A) | Survey the facility for extension cords being used as permanent wiring and have a licensed electrician hard wire electrical outlets in place as needed. | 5-14-19 | Curtis |
| Perfekta | There are several instances in which an electrical extension cord is being used in lieu of fixed wiring. Flexible cords and/or cables shall not be used as a substitute for the fixed wiring of a structure. | 1910.305(g)(1)(iv)(A) | Survey the facility for extension cords being used as permanent wiring and have a licensed electrician hard wire electrical outlets in place as needed. | 8/16/19 | Curtis |
| Plant 3 | An electrical extension cord was run through a hole in the wall (see Photo 2314, 2315). Flexible cords and cables may not be used where run through holes in walls, ceilings, or floors. | 1910.305(g)(1)(iv)(B) | Eliminate the use of the extension cord through the wall or install an outlet by a licensed electrician on the necessary side of the wall. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | A flexible electrical cord was run through a hole in the wall (see Photo 4251). Flexible cords and cables may not be used where run through holes in walls, ceilings, or floors. | 1910.305(g)(1)(iv)(B) | Eliminate the use of the flexible cord through the wall or install an outlet by a licensed electrician on the necessary side of the wall. | 7-10-19 | Curtis |
| Learjet – Tucson, AZ | (a) Cabinet room: An electrical cord was run through the wall and under the door, to power the electrical tools that was being used. The room had no electrical outlet. | 1910.305(g)(1)(iv)(B) | Electrical cords and cables shall not be run through holes in wall, ceilings or floors. | 2020 | ADOSH |
| Figeac | The electrical cord to a portable fan was strung through the doorway to the Assembly Shop (Photo 8). | 1910.305(g)(1)(iv)(C) | Relocate the power cord so that it does not run through the doorway. | 07/2014 | Scott |
| Pegasus Labs | There is an extension cord strung across the aisle way which is taped to the ground (Photo 295). Flexible cords shall not be attached to building surfaces. | 1910.305(g)(1)(iv)(D) | Remove the tape and reroute the cord so that it is not strung across the aisle or provide an aisle cover for the electrical cord. | 08/2017 | Scott |
| Kansas Ethanol | A flexible electrical cord for a fan is permanently affixed to the building structure with a zip-tie (see Photo 2881). Flexible cords and cables shall not be used where attached to building surfaces. | 1910.305(g)(1)(iv)(D) | Remove zip-tie from cord which is considered a permanent method of affixing to building surface with another method which is easily removable. | 11-7-18 | Curtis |
|  |  |  |  |  |  |
| Capps | There is an electrical cord suspended from the ceiling that does not have strain relief to prevent the electrical cord from separating from the device (Photo 40) | 1910.305(g)(2)(iii) | Conduct a facility wide survey to determine how many electrical drop cords do not have strain relief and repair devices accordingly. | 06/2014 | Scott |
| Atlas Aerospace | There is an electrical cord suspended from the ceiling that does not have strain relief to prevent the electrical cord from separating from the device (see Photo 2223). | 1910.305(g)(2)(iii) | Conduct a facility wide survey to determine how many electrical drop cords do not have strain relief and repair devices accordingly. | 5-9-18 | Curtis Leiker |
| Hillsboro Industries | There is an electrical cord suspended from the ceiling that does not have strain relief to prevent the electrical cord from separating from the device (see Photo 2346). | 1910.305(g)(2)(iii) | Conduct a facility wide survey to determine how many electrical drop cords do not have strain relief and repair devices accordingly. | 5-23-18 | Curtis Leiker |
| Learjet – Tucson AZ | (a) Hanger H: South end of the hanger an electrical extension cord was not provided with strain relief.    (b) Hanger H: West end of the hanger an scissor lift that had been inspected that morning was found to not have strain relief on the electrical plug. | 1910.305(g)(2)(iii) | Flexible cords and cables shall be connected to devices and fittings so that strain relief is provided that will prevent pull from being directly transmitted to joints or terminal screws. | 2020 | ADOSH |
| Tank Connection East | The protective cover for one of the fluorescent lights has been removed exposing the electrical parts (Photo 37). | 1910.305(j)(1)(i) | Replace the missing light cover. | 02/2013 | Scott |
| Mid Continent | An electrical receptacle mounted on a beam in this location is broken (Photo 49). | 1910.305(j)(2)(i) | Repair or replace the broken electrical outlet. | 06/2014 | Scott |
| ATC | An electrical receptacle mounted on a beam in Closed Mold is exposed to liquid. (Photo 42) | 1910.305(j)(2)(iv) | Replace the receptacle with one that has a cover that will protect it from liquid splash. | 10/2014 | James |
| Learjet – Tucson AZ | (a) Building J: The water cooler placed by the wall was plugged into an outlet the outlet was not GFCI protected. | 1910.305(j)(2)(iv) | Receptacles installed in a wet or damp location shall be suitable for the location. | 2020 | ADOSH |
| Hillsboro Industries | A portable fan was in place in a wet location that was plugged into an outlet that did not appear to be designed for wet locations with ground fault circuit interrupter (GFCI) protection (see Photo 27). | 1910.305(j)(2)(iv)  2020 NEC 210.8(B)(6) | Receptacles installed in a wet or damp location shall be suitable for the location and need GFCI protection. | 6-17-21 | Curtis |
| NPC | A GFCI electrical outlet (see Photo 3115) was missing its cover in Blending Bay 5. | 1910.305(j)(2)(vi)  1910.305(j)(2)(vii) | Ensure all the receptacle has the proper weatherproof cover in use. | 2-7-19 | Curtis Leiker |
| Hillsboro Industries | Music speakers are being kept in the spray booths (see Photo 29, 30) and are not approved equipment in hazardous (classified) locations where ignitable or combustible properties of gas, vapor, or dust could be present. | 1910.307(c)(2)(i) | Electrical equipment must be approved for hazardous locations or removed from inside the spray booths. | 6-17-21 | Curtis |
| Global Parts | Electrical outlet and disconnect are in close proximity to open solvent cleaning station using a flammable liquid (See Photo 29). | 1910.307(c)(2)(i) | All electrical equipment within 5 feet of the vapor source should be rated for being in a hazardous atmosphere for flammable vapors. Otherwise, unapproved electrical equipment should not be within 5 feet in all directions of the vapor source. | 8-19-21 | Curtis |
| Capps | The air conditioner in the paint mix room (See Photo 22) does not appear to be approved equipment in hazardous (classified) locations where ignitable or combustible properties of gas or vapor could be present. | 1910.307(c)(2)(i) | Electrical equipment must be approved for hazardous locations. Ensure air conditioning unit is approved for Class I locations or install new unit that is safe for these areas. | 1-12-21 | Curtis |
| Perfekta | Employees are exposed to energized conductors greater than 50 volts but have not received any safety training related to work practices such as troubleshooting, replacing, and maintaining electrical equipment in the facility. | 1910.332(b)(1) | Train all applicable employees who are exposed to energized conductors greater than 50 volts. Training should include how to safely test and operate electrical equipment, use and select PPE, how to deenergize equipment, when to deenergize equipment, lockout/tagout of electrical equipment, the hazards of arc flash, and general electric hazards. Training should be done by a qualified trainer or company. | 8/16/19 | Curtis |
| MPM | Employees are exposed to energized conductors greater than 50 volts but have not received any safety training related to work practices such as troubleshooting, replacing, and maintaining electrical equipment in the facility. | 1910.332(b)(1) | Train all applicable employees who are exposed to energized conductors greater than 50 volts. Training should include how to safely test and operate electrical equipment, use and select PPE, how to deenergize equipment, when to deenergize equipment, lockout/tagout of electrical equipment, the hazards of arc flash, and general electric hazards. Training should be done by a qualified trainer or company. | 8-23-21 | Curtis |
| Barkman Honey | While qualified electrical employees receive safety training, unqualified employees have not received training to become familiar with electrically related safety practices which are necessary for their safety | 1910.332(b)(2) | Implement a safety training program to train employees who do not work on electrical equipment to be informed of all applicable safe work practices associated with electrical equipment that is necessary for their job role. | 2-11-22 | Curtis |
| Sonaca | Submersible pump cord taped to cover tear in insulation (Photos 12, 15). | 1910.334 (a)(2)(i);  1910.334 (a)(2)(ii) | Replace power cord to pump and ensure no employees use it until necessary repairs and tests necessary to render the equipment safe. | 08/2012 | Scott / Ben |
| Kansas Ethanol | Electrical cord on portable heating coil was damaged and repaired with electrical tape (see Photo 14). If there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item shall be removed from service. | 1910.334(a)(2)(ii) | The equipment should be removed from service until the cord is repaired or replaced. | 11-7-18 | Curtis |
| Figeac | The extension cord in use on the south side of the Assembly Shop has exposed wiring at the plug end (Photo 9). | 1910.334 (a)(2)(i);  1910.334 (a)(2)(ii) | The equipment should be removed from service until the cord is repaired or replaced. | 07/2014 | Scott |
| Hillsboro Industries | Electrical extension cord plugged into outlet was damaged (see Photo 4254). If there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item shall be removed from service. | 1910.334(a)(2)(ii) | The equipment should be removed from service until the cord is repaired or replaced. | 7-10-19 | Curtis |
| NPC | The ground prong on the cord plug for a large floor fan had been cut off (Photo 8). | 1910.334(a)(3)(i);  1910.334(a)(3)(ii) | Replace the cord plug with one in which the ground prong is intact. | 12/2013 | Scott |
| Building D | The electrical insulation is damaged on cord in welding area (see Photo 2259). | 1910.334(a)(2) | Have a licensed electrician replace the electrical cord with a new one. | 5-9-18 | Curtis Leiker |
| Vermillion | Electrical cord to fan has missing outer sheath insulation. | 1910.334(a)(2) | Have a licensed electrician repair or replace the electrical cord. | 7-23-18 | Curtis Leiker |
| Kansas Ethanol | Electrical cord on portable heating coil was damaged and repaired with electrical tape (see Photo 2889). If there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item shall be removed from service. | 1910.334(a)(2)(ii) | The equipment should be removed from service until the cord is repaired or replaced. | 11-7-18 | Curtis Leiker |
| Hillsboro Industries | Electrical extension was damaged in Aluminum Truck Bed area (see Photo 31) and electrical cord damaged on portable fan in Fabrication (see Photo 32). If there is a defect or evidence of damage that might expose an employee to injury, the defective or damaged item shall be removed from service. | 1910.334(a)(2)(i);  1910.334(a)(2)(ii) | The equipment should be removed from service until the cord is repaired or replaced. | 6-17-21 | Curtis |
| Kuhn | The facility maintenance staff works on live electrical equipment up to 480 volts. While some arc flash PPE has been purchased, there is no evidence that the facility has conducted an arc flash hazard analysis, labeled the electrical equipment appropriately, trained the maintenance staff on arc flash hazards, inspected the PPE every six months, and implemented an arc flash Energized Work Permit. While there is no specific OSHA standard covering arc flash hazards, the OSHA Region 7 Assistant Area Director has indicated that citations will be issued under the General Duty Clause and they would utilize NFPA 70E as their guidance to determine compliance. | 1910.335(a)(1)(i);  NFPA 70E – Standard for Electrical Safety in the Workplace;  Section 5(a)(1) of General Duty Clause | Determine if it is necessary for the maintenance staff to work on live electrical equipment. The employer must demonstrate that de-energizing introduces additional hazards or if it is just a matter of being infeasible. If work on live electrical equipment is required, comply with all requirements of NFPA 70E including: Have a licensed electrical contractor conduct an arc flash hazard analysis on all electrical equipment that must be worked on while live; Label all electrical equipment accordingly; Purchase the appropriate PPE and inspect the PPE as required; Train maintenance personnel; and implement the use of an Electrical Work Permit implemented. | 03/2016 | Scott |
| Hillsboro Industries | The facility maintenance staff works on live electrical equipment more than 50 volts. The facility has not conducted an arc flash hazard analysis, labeled the electrical equipment appropriately, or trained the maintenance staff. | 1910.335(a)(1)(i);  NFPA 70E – Standard for Electrical Safety in the Workplace;  Section 5(a)(1) of General Duty Clause | Determine if it is necessary for the maintenance staff to work on live electrical equipment. If work on energized electrical equipment is required, comply with all requirements of NFPA 70E including: Have a licensed electrical contractor conduct an arc flash hazard analysis on all electrical equipment that must be worked on while live. Label all electrical equipment accordingly. Purchase the appropriate PPE and inspect the PPE as required. Train maintenance personnel. | 5-23-18 | Curtis Leiker |
| USD 259 | The facility maintenance staff works on live electrical equipment up to 480 volts. While some arc flash PPE has been purchased, there is no evidence that the facility has conducted an arc flash hazard analysis, labeled the electrical equipment appropriately, trained the maintenance staff on arc flash hazards, inspected the PPE every six months, and implemented an arc flash Energized Work Permit. While there is no specific OSHA standard covering arc flash hazards, the OSHA Region 7 Assistant Area Director has indicated that citations will be issued under the General Duty Clause and they would utilize NFPA 70E as their guidance to determine compliance. | 1910.335(a)(1)(i);  NFPA 70E – Standard for Electrical Safety in the Workplace;  Section 5(a)(1) of General Duty Clause | Determine if it is necessary for the maintenance staff to work on live electrical equipment. The employer must demonstrate that de-energizing introduces additional hazards or if it is just a matter of being infeasible. If work on live electrical equipment is required, comply with all requirements of NFPA 70E including: Have a licensed electrical contractor conduct an arc flash hazard analysis on all electrical equipment that must be worked on while live; Label all electrical equipment accordingly; Purchase the appropriate PPE and inspect the PPE as required; Train maintenance personnel; and implement the use of an Electrical Work Permit implemented. | 7/30/2018 | Scott Smith |
| Hillsboro Industries | The facility maintenance staff works on live electrical equipment more than 50 volts such as voltage testing. The staff is not trained on current NFPA 70E safe work practices nor supplied with necessary electrical PPE and equipment. | 1910.335(a)(1)(i);  NFPA 70E – Standard for Electrical Safety in the Workplace;  Section 5(a)(1) of General Duty Clause | Determine if it is necessary for the maintenance staff to work on live electrical equipment. If work on energized electrical equipment is required, comply with all requirements of NFPA 70E including: Purchase the appropriate PPE and inspect the PPE as required. Train maintenance personnel to qualified level as needed for their job tasks. | 7-10-19 | Curtis |
| Perfekta | Employees are working in areas where they are exposed to electrical hazards of greater than 50 volts and are not provided with electrical PPE as needed. | 1910.335(a)(1)(i) | Provided necessary electrical PPE to employees that are required to operate, test, troubleshoot, replace, or maintain electrical equipment greater than 50 volts. | 8/16/19 | Curtis |
| MPM | Employees are working in areas where they are exposed to electrical hazards of greater than 50 volts and are not provided with electrical PPE as needed. | 1910.335(a)(1)(i) | Provided necessary electrical PPE to employees that are required to operate, test, troubleshoot, replace, or maintain electrical equipment greater than 50 volts. | 8-23-21 | Curtis |
| Excel Industries | Employees were observed within the approach boundaries of exposed electrical equipment that was being worked on by contractors (see Photo 4897). | 1910.335(b)(1)  1910.335(b)(2)  1910.355(b)(3) | To protect unauthorized personnel from exposure to energized electrical equipment, ensure either safety signs and tags, barricades, or attendants are used at all times when exposing energized conductors. | 12-2-19 | Curtis |
| **Subpart Z – Toxic and Hazardous Substances** | | | | | |
| Kuhn | There was no indication that any industrial hygiene (IH) sampling has been conducted for potential exposures to hazardous substances such as welding fumes, solvents, etc. The workers’ compensation carrier has conducted some IH sampling in the past but the results were invalid. | 1910.1000 | Perform a risk assessment of each process performed and develop an Industrial Hygiene Sampling Plan for each process or task. Follow up the IH Sampling Plan with actual personal exposure monitoring where warranted. | 03/2016 | Scott |
| Collins Bus | **Major** – Employees routinely sand and grind on skins that have been pre-painted with primer that contains strontium chromate. There was no indication that any industrial hygiene (IH) sampling has been conducted for potential exposures to hazardous substances such as hexavalent chromium (CrVI). | 1910.1000 | Perform industrial hygiene personal exposure monitoring on employees that have a potential exposure to CrVI. Note: IH sampling was completed on April 1, 2015 and laboratory results indicate employee exposures of more than twice the permissible exposure limit (PEL) for CrVI. A separate IH sampling report is pending. | 02/2015 | Scott |
| USD 259 | Employees routinely sand and cut on wood and have the potential exposure to formaldehyde. There was no indication that any industrial hygiene (IH) sampling has been conducted for potential exposures to hazardous substances such as formaldehyde. | 1910.1000 | Perform industrial hygiene personal exposure monitoring on employees that have a potential exposure to formaldehyde. | 7-30-2018 | Scott |
| USD 259 | Employees routinely use a bulb crusher to dispose of spent fluorescent bulbs (Photo 63). There was no indication that any industrial hygiene (IH) sampling has been conducted for potential exposures to hazardous substances such as mercury. | 1910.1000 | Perform industrial hygiene personal exposure monitoring on employees that have a potential exposure to mercury. | 7-30-2018 | Scott |
| USD 259 | Employees routinely conduct welding operations. There was no indication that any industrial hygiene (IH) sampling has been conducted for potential exposures to hazardous substances such as welding fumes. | 1910.1000 | Perform industrial hygiene personal exposure monitoring on employees that have a potential exposure due to welding. | 7-30-2018 | Scott |
| Faultless | **Moderate** – The boiler room contains asbestos containing material (ACM). There is no evidence that the facility has conducted monitoring to determine if airborne concentrations of asbestos are above the permissible exposure limit (PEL). | 1910.1001(c)(1);  1910.1001(d) | Perform industrial hygiene monitoring in accordance with Appendix A of the OSHA asbestos standard. If asbestos levels are above the PEL additional regulatory requirements will be necessary. | 02/2015 | Scott |
| MPM | At the time of the audit there was no evidence that employee medical records are being maintained for the duration of employment plus 30 years. | 1910.1020(d)(1)(i) | Begin saving and/or archiving all employee medical records in a secure location. | 8-23-21 | Curtis |
| MPM | At the time of the audit there was no evidence that employee exposure records, such as Safety Data Sheets (SDSs) or industrial hygiene sampling, are being maintained for 30 years. | 1910.1020(d)(1)(ii) | Begin saving and/or archiving all employee exposure records in a secure location. | 8-23-21 | Curtis |
| PBI Gordon – KC | There was no evidence that an asbestos survey has been completed. The main building is over 100 years old and there are several suspect asbestos areas (Photos 55, 56) | 1910.1001(j)(3)(i) | Conduct an asbestos survey to determine the presence, location, and quantity of Asbestos Containing Material (ACM). | 05/2013 | Scott |
| Faultless | **Moderate** – There is no evidence that asbestos is included in the hazard communication program. | 1910.1001(j)(1)(iii) | Add information on asbestos to the facility Hazard Communication Program. | 02/2015 | Scott |
| Faultless | **Moderate** – There are no warning signs posted on the door leading to the boiler room. | 1910.1001(j)(4)(i);  1910.1001(j)(4)(ii) | Post a warning sign on the door to the boiler room that states “Danger; Asbestos; May Cause Cancer; Causes Damage to Lungs; Authorized Personnel Only.” | 02/2015 | Scott |
| Triumph – KC | There was no documentation that employees have received any initial or annual information on Access to Medical and Exposure Records. This information must be given to employees initially and annually thereafter. | 1910.1020(g)(1);  1910.1020(g)(1)(i) thru (iii) | Need to inform employees accordingly. | 03/2017 | Scott |
| Kice Industries | There was no evidence that employees have received any initial or annual information on Access to Medical and Exposure Records. This information must be given to employees initially and annually thereafter. | 1910.1020(g)(1);  1910.1020(g)(1)(i) thru (iii) | Need to inform employees accordingly. | 5-16-18 | Curtis Leiker |
| MPM | There was no evidence that employees have received any initial or annual information on Access to Medical and Exposure Records. This information must be given to employees initially and annually thereafter. | 1910.1020(g)(1);  1910.1020(g)(1)(i) thru (iii) | Need to inform employees accordingly. Can be done through training, e-mail, mail, or a posting in the workplace. | 8-23-21 | Curtis |
| Collins Bus | **Major** – Employees routinely sand and grind on skins that have been pre-painted with primer that contains strontium chromate. No program for Hexavalent Chromium (CrVI) exists for the facility. | 1910.1026 | If the facility continues to sand on the pre-painted skins, a Hexavalent Chromium program will need to be developed. Elements of the program include but are not limited to: Develop a written plan; Establish a regulated area; Provide demarcation of the area; Limit access to the regulated area; Provide engineering controls; Provide PPE; Provide change facilities; Provide CrVI medical examinations; and Provide quarterly personal exposure monitoring. | 02/2015 | Scott |
| MPM | Employees are brushing and spraying paint (See Photo 52) that contains strontium chromate and barium chromate, which both are hexavalent chromium compounds, but there is no evidence that an evaluation has been done to assess employee exposures to airborne hexavalent chromium. | 1910.1026(d)(1) | Perform hexavalent chromium exposure assessments through a qualified industrial hygienist to determinate the employees’ 8-hr time-weight-average (TWA). Sampling must be completed on each shift, each job classification, and each work area. | 8-23-21 | Curtis |
| E-ONE | Welders routinely weld on stainless steel parts. No program for Hexavalent Chromium (CrVI) exists for the facility. | 1910.1026(e)(1);  1910.1026(e)(2);  1910.1026(e)(3);  1910.1026(e)(3)(ii);  1910.1026(h)(1) | Perform CrVI exposure determinations for welders welding on stainless steel parts (See Item 28 above). If action levels or permissible exposure levels (PEL) are exceeded, E-ONE must create a written Hexavalent Chromium program with required engineering and work practice controls, and provide training for all affected personnel. | 05/2014 | Scott |
| Sonaca | No program for Hexavalent Chromium exists for facility. No signs posted for a Hexavalent Chromium Regulated Area, and PPE was not worn by employees entering paint booth (Photos 10, 21, 22, 23, 24). | 1910.1026(e)(1);  1910.1026(e)(2);  1910.1026(e)(3);  1910.1026(e)(3)(ii);  1910.1026(h)(1) | Post Hexavalent Chromium Regulated Area signs at all entrances to paint booth. Create Hexavalent Chromium Awareness Program and provide training for all personnel entering Regulated Areas. | 08/2012 | Scott / Ben |
| Capps | An employee was spraying paint in a regulated area with hexavalent chromium was observed wearing the same shoes in an area where other employees are allowed to walk with uncontaminated shoes or without shoe covers. | 1910.1026(i)(2) | Instruct employee to wear shoe covers while inside the hexavalent chromium regulated area or provide other means to ensure other employee shoes are not cross-contaminated with shoes worn in a hexavalent chromium. Must have clear demarcation. | 1-12-22 | Curtis |
| Capps | While the breakroom is being cleaned routinely, industry practice is to clean all eating and drinking surfaces daily where employees who are in a hexavalent chromium program eat and drink. | 1910.1026(i)(4)(i) | Begin cleaning all eating and drinking areas where employees who are in the hexavalent chromium program are using to ensure all surfaces are as clean as practicable from hexavalent chromium. | 1-12-22 | Curtis |
| Capps | An employee was observed in the main office still wearing a Tyvek suit used for protection in hexavalent chromium areas. | 1910.1026(i)(4)(ii) | Instruct employees to remove all PPE contaminated when entering areas where employees are allowed to eat and drink. Employees should be removing all hexavalent chromium contaminated PPE at the end of the task involving exposure. | 1-12-22 | Curtis |
| Capps | The site’s Hexavalent Chromium Exposure Plan states that training will take place within 30 days of hire and annual refresher training will occur. There was no documentation that the new employee recently hired received training on Hexavalent Chromium. There was also no documentation that all employees are receiving annual Hexavalent Chromium training. | 1910.1026(l)(2)  Capp’s Hexavalent Chromium Exposure Plan | Ensure that all new employees receive Hexavalent Chromium Exposure training. | 06/20/12 | Scott |
| 1A Auto | All three sites have personnel that are first aid and CPR trained. There is no evidence that a written Exposure Control Plan is in place for employees that are potentially occupationally exposed to bloodborne pathogens. | 1910.1030(c)(1)(i) | iSi Environmental will develop a written plan that is designed to eliminate or minimize employee exposure. | 01/2013 | Scott |
| MPM | The facility maintains a written bloodborne pathogens policy (i.e. Exposure Control Plan) for employees that are potentially occupationally exposed to bloodborne pathogens who are designated as responsible for rending medical assistance, but it does not include all the provisions necessary mentioned in the standard. | 1910.1030(c)(1)(i) | Develop a written plan that is designed to eliminate or minimize employee exposure. Must include:   * Exposure determination. * Schedule and method of implementation of engineering and work practices, PPE, housekeeping, hepatitis B vaccination, labels, signs, information, training, and medical records.   Procedures surrounding exposure incidents. | 8-23-21 | Curtis |
| Global Parts | The facility has approximately 10 people trained on first aid and CPR. There is no evidence that a written Exposure Control Plan is in place for employees that are potentially occupationally exposed to bloodborne pathogens who are designated as responsible for rending medical assistance. | 1910.1030(c)(1)(i) | Develop a written plan that is designed to eliminate or minimize employee exposure. Must include:   * Exposure determination. * Schedule and method of implementation of engineering and work practices, PPE, housekeeping, hepatitis B vaccination, labels, signs, information, training, and medical records. * Procedures surrounding exposure incidents. | 8-19-21 | Curtis |
| Pet-Ag | The facility does not maintain a written bloodborne pathogens policy (i.e. Exposure Control Plan) for employees that are potentially occupationally exposed to bloodborne pathogens who are designated as available for rending medical assistance.  Currently 9 employees are trained on both shifts but the employees are not responsible or expected to render medical assistance as the nearest fire station / EMS is 4.2 miles away with an estimated 5 minute response time (8 minutes based on normal traffic flow).  OSHA’s current interpretation is that emergency care must be available within 3-4 minutes if the workplace is expected to have serious accidents involving falls, suffocation, electrocution, or amputation. | 1910.1030(c)(1)(i)  1910.151(b)  LOI 1-16-07  LOI 3-23-07 | Obtain an official response time from the fire station / EMS and ensure it is under 4 minutes, or designate first aid providers to render medical assistance to injured employees then develop a written plan that is designed to eliminate or minimize employee exposure. Must include:   * Exposure determination. * Schedule and method of implementation of engineering and work practices, PPE, housekeeping, hepatitis B vaccination, labels, signs, information, training, and medical records. * Procedures surrounding exposure incidents.   See Appendixes G and H. | 9-14-21 | Curtis |
| MPM | There was no evidence that the written Exposure Control Plan is reviewed and updated annually. | 1910.1030(c)(1)(iv) | After developing a full written plan that is compliant to OSHA standard, begin reviewing and updating the plan on an annual basis. The review should be documented. | 8-23-21 | Curtis |
| MPM | There is no evidence that those with occupational exposure to bloodborne pathogens have been offered the Hepatitis B vaccinations series. Those that decline the vaccination series need to sign Appendix A to the standard to acknowledge it has been made available to them and they have declined. | 1910.1030(f) | Offer the Hepatitis B vaccination series to all employees who have occupational exposure. Keep signed declination forms on file for all employees who decline the vaccination series. See Appendix K. | 8-23-21 | Curtis |
| ATC | There is no evidence that employees with potential occupational exposure to bloodborne pathogens are trained. Dean Lane is the only employee with a job description that triggers BBP and he has no records documenting training or Hepatitis B vaccinations. | 1910.1030(f)(1) thru (2)  1910.1030(g)(2);  1910.1030(g)(2)(i);  1910.1030(g)(2)(ii)(A thru N) | Need to make available hepatitis B vaccine and vaccination series to all employees who have occupational exposure.  Training is required initially and at least annually thereafter. Need to train potentially exposed employees accordingly. | 10/2014 | James |
| XLT Ovens | There is no evidence that employees with potential occupational exposure to bloodborne pathogens are trained. | 1910.1030(g)(2);  1910.1030(g)(2)(i);  1910.1030(g)(2)(ii)(A thru N) | Training is required initially and at least annually thereafter. Need to train potentially exposed employees accordingly. | 11/2013 | Scott |
| MPM | There is no evidence that employees with occupational exposure to bloodborne pathogens are receiving annual training on bloodborne pathogens. | 1910.1030(g)(2)(ii) | Since CPR and first aid training is only required every two years, an annual refresher training on bloodborne pathogens must be provided in the time prior to renewing CPR and first aid training. Bloodborne pathogen training is required initially and annually thereafter. | 8-23-21 | Curtis |
| Allied Labs | The Health and Safety Plan does not address ionizing radiation (Photo 54). | 1910.1096 | Develop a written plan that documents the proper use of devices, training, the assignment of a Radiation Safety Officer, warning signs, and a sampling plan for all affected employees. | 04/2013 | Scott / Keith |
| Allied Labs | The written Hazard Communication Program does not meet the new requirements of 1910.1200 which was updated by OSHA on March 26, 2012 | 1910.1200 | Review new requirements for UN Globally Harmonized System of Classification and Labeling of Chemicals (GHS) and update written program as needed. | 04/2013 | Scott / Keith |
| Triumph – KC | There is no written Hazard Communication Program in place that covers the following: Container labeling; Safety Data Sheets (SDS); employee training; a list of the hazardous chemicals known to be present in the workplace; and the methods used to inform employees of the hazards of non-routine tasks. | 1910.1200(e)(1);  1910.1200(e)(1)(i);  1910.1200(e)(1)(ii) | Develop a written Hazard Communication Program that contains all of the requirements listed. The plan must be kept in the workplace and available for all employees to review. | 03/2017 | Scott |
| Kuhn | The site has SDS sheets available for review by employees but there was no documentation that the list of hazardous chemicals or the SDS sheets are updated periodically. | 1910.1200(e)(1)  1910.1200(e)(2) | Update the chemical inventory and associated SDSs on an annual basis. | 03/2016 | Scott |
| Excel Industries | The written Hazard Communication program lacks information on how employee information and training will be met and the methods the employer will use to inform employees of the hazards of non-routine tasks, and the hazards associated with chemicals contained in unlabeled pipes in their work areas. | 1910.1200(e) | Update the written Hazard Communication program to include information on employee training, non-routine tasks, and unlabeled piping. | 12-2-19 | Curtis |
| MPM | The facility maintains written safety policies that contain only portions of the requirements mentioned in the Hazard Communication standard. The written Hazard Communication Program must cover the following:   * GHS * Container labeling; * Safety Data Sheets (SDS); * Employee training; * A list of the hazardous chemicals known to be present in the workplace; and * The methods used to inform employees of the hazards of non-routine tasks. | 1910.1200(e) | Develop a written Hazard Communication Program that contains all of the requirements listed. The plan must be kept in the workplace and available for all employees to review. | 8-23-21 | Curtis |
| Global Parts | There is no written Hazard Communication Program in place that covers the following:   * GHS * Container labeling; * Safety Data Sheets (SDS); * Employee training; * A list of the hazardous chemicals known to be present in the workplace; and * The methods used to inform employees of the hazards of non-routine tasks. | 1910.1200(e) | Develop a written Hazard Communication Program that contains all of the requirements listed. The plan must be kept in the workplace and available for all employees to review. | 8-19-21 | Curtis |
| Kice | There were several secondary containers of hazardous chemicals that were not labeled correctly (Example - Photo 17). The label must contain the chemical name and provide at least general information regarding the hazards of the chemical, which will provide employees with the specific information regarding the physical and health hazards of the chemical in the container. | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Ensure that all secondary containers are labeled appropriately utilizing the Hazardous Materials Identification System (HMIS), National Fire Protection Association (NFPA), Globally Harmonized System of Classification (GHS) or other hazard identification labeling system. Information on labeling systems is provided in Appendix E. | 03/2017 | Scott |
| Mid Continent | Employees are using common product containers for secondary containers of chemicals (Photos 52, 53, 54). The label must provide at least general information regarding the hazards of the chemicals, which will provide employees with the specific information regarding the physical and health hazards of the chemical in the container. | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | At a minimum, the old product label should be marked through so that it won’t be confused with a consumable product. Ensure that all secondary containers are labeled utilizing the HMIS, NFPA, GHS or other hazard identification labeling system. | 06/2014 | Scott |
| Atlas Aerospace | There were several secondary containers of hazardous chemicals that were not labeled correctly (see Photos 2218, 2221, 2224, 2235). The label must contain the chemical name and provide at least general information regarding the hazards of the chemical, which will provide employees with the specific information regarding the physical and health hazards of the chemical in the container. | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Ensure that all secondary containers are labeled appropriately utilizing the Hazardous Materials Identification System (HMIS), National Fire Protection Association (NFPA), Globally Harmonized System of Classification (GHS) or other hazard identification labeling system. | 5-9-18 | Curtis Leiker |
| Kuhn | Ash from the burn off oven is placed in a drum (Photo 45). The drum contains the original product label and therefore was not labeled properly. The label must contain the chemical name and provide at least general information regarding the hazards of the chemical, which will provide employees with the specific information regarding the physical and health hazards of the chemical in the container. | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Ensure that all secondary containers are labeled appropriately utilizing the HMIS, NFPA, GHS or other hazard identification labeling system. | 03/2016 | Scott |
| Premier Processing | There were several secondary containers of hazardous chemicals in which the label was not legible due to paint or other material covering the label (Photos 2, 3). | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Secondary containers should be relabeled if the label becomes illegible. | 11/2013 | Scott |
| Kice Industries | There were several secondary containers of hazardous chemicals that were not labeled correctly (see Photos 2308, 2309, 2310, 2319, 2320, 2321). The label must contain the chemical name and provide at least general information regarding the hazards of the chemical, which will provide employees with the specific information regarding the physical and health hazards of the chemical in the container. | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Ensure that all secondary containers are labeled appropriately utilizing the Hazardous Materials Identification System (HMIS), National Fire Protection Association (NFPA), Globally Harmonized System of Classification (GHS) or other hazard identification labeling system. | 5-16-18 | Curtis Leiker |
| Hillsboro Industries | Secondary container of alcohol was not labeled correctly (see Photo 2343). The label must contain the chemical name and provide at least general information regarding the hazards of the chemical, which will provide employees with the specific information regarding the physical and health hazards of the chemical in the container. | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Ensure that all secondary containers are labeled appropriately utilizing the Hazardous Materials Identification System (HMIS), National Fire Protection Association (NFPA), Globally Harmonized System of Classification (GHS) or other hazard identification labeling system. | 5-23-18 | Curtis Leiker |
| HOC | Far north tank in tank farm needs to be labeled with tank contents and NFPA diamond | 1910.1200(f)(6);  1910.1200(f)(6)(i);  1910.1200(f)(6)(ii);  1910.1200(f)(7) | Label tank accordingly. | 10/2012 | Scott |
| Kansas Ethanol | No secondary label on oil container (see Photo 2887). | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Secondary containers should be relabeled if the label becomes illegible. | 11-7-18 | Curtis |
| Kansas Ethanol | No secondary label on container holding sump pump for fire water (see Photo 6). | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Label container with chemical name. | 6-26-19 | Curtis Leiker |
| Kansas Ethanol | Grease guns did not have secondary chemical labeling (see Photo 7). The label must contain the chemical name and provide at least general information regarding the hazards of the chemical, which will provide employees with the specific information regarding the physical and health hazards of the chemical in the container. | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Ensure that all secondary containers are labeled appropriately utilizing the Hazardous Materials Identification System (HMIS), National Fire Protection Association (NFPA), Globally Harmonized System of Classification (GHS) or other hazard identification labeling system. | 6-26-19 | Curtis Leiker |
| Ultra Clean Midwest | The electropolishing processing tanks are labeled with the hazard identification but are not labeled with the product identifier of the contents of the chemicals in the tanks (See Photo 8710). Secondary containers must be labeled with both the product identifier and hazard information. | 1910.1200(f)(6);  1910.1200(f)(6)(ii) | Add the name of the chemical contents to the outside of the tanks next to the hazard identification labels. | 12-8-21 | Curtis |
| MPM | The facility is not currently maintaining a Safety Data Sheet (SDS) for each hazardous chemical in the workplace. | 1910.1200(g)(1) | Obtain SDSs from the chemical manufacturer for all hazardous chemicals used in the facility. Once obtained, create a list of all chemicals and make readily available to all employees. | 8-23-21 | Curtis |
| Hillsboro Indusries | An aerosol can of CRC 5-56 located in Maintenance did not have an associated safety data sheet (SDS). The employer is required to maintain required SDS’s for each hazardous chemical and readily accessible to employees in their work areas. | 1910.1200(g)(8) | Obtain SDS for chemical and add to chemical inventory database to allow for employee access. | 7-22-20 | Curtis |
| Perfekta | There was no documentation that employees receive adequate training on the hazard communication standard before their initial assignment. There is only a small paragraph in the Employee Handbook. Specifically, training must include the following: Methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area; The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area; The measures employees can take to protect themselves from these hazards; The details of the hazard communication program developed by the employer, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer; The safety data sheet, including the order of information and how employees can obtain and use the appropriate hazard information. | 1910.1200(h)(1) | Implement a new employee safety training program and include information on hazard communication including the Global Harmonization System. All training should be documented. | 02/2017 | Scott |
| MPM | Employees are not currently trained initially and whenever a new chemical hazardous is introduced into the facility. | 1910.1200(h) | Implement a new employee safety training program and include information on the Hazard Communication program. All training should be documented. | 8-23-21 | Curtis |
| XLT Ovens | Employees have not been trained on the new Globally Harmonized System (GHS) labeling system. Training is required before December 1, 2013. | 1910.1200(j)(1) | In May, 2012 OSHA revised the hazardous communication standard to reflect the new GHS procedures. All employees need to be trained so that they recognize and understand the new GHS labeling, pictograms, and Safety Data Sheets. | 11/2013 | Scott |
| **Hazardous Waste** | | | | | |
| Sonaca | Hazardous Waste Containers are not properly secured. Hazardous waste was placed in improper container (not labeled or kept closed). Satellite accumulation container label on container is not visible/legible (Photos 18, 19, 20). | 40CFR 262.34(a)(3);  40CFR 262.34(a)(1)(i) | Secure Hazardous Waste Containers with chain in Flammable Liquid Storage Room or remove funnel and pump from containers and replace with bungs for a closed container. Ensure hazardous waste container is labeled with the words “Hazardous Waste” and the label is visible/legible. | 08/2012 | Scott |
| Premier Processing | There were two drums of hazardous waste in which there was no hazardous waste label (Photo 4) | 40 CFR 262.34(a)(e) | Ensure that all hazardous waste containers are marked, stenciled, labeled, or otherwise identified with the legible words “Hazardous Waste.” | 11/2013 | Scott |
| NPC | There was a 55-gallon hazardous waste drum in the satellite area in the paint area (Photo 1) with an accumulation date from 2010. The drum should not have a date on it until it is full. | 40 CFR 262.34(c)(1)(ii);  40 CFR 262.34(c)(2) | Replace the label with a hazardous waste label that contains the contents but not the date. | 06/2012 | Scott |
| APR | The facility utilizes a funnel to add material to the hazardous waste drum. The funnel is not sealed to the drum (Photo 18). | 40 CFR 265.173 | Purchase funnel that will screw into the drum bung hole or one that has a suitable gasket seal. A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. | 12/2012 | Scott |
| Kuhn | Spent lamp bulbs are considered Universal Hazardous Waste and are being stored in open, unlabeled boxes (Photos 3540, 3541, 3542). There is no evidence that the spent lamps have been in accumulation for less than one year. Each container or package in which spent lamps are contained must remain closed; be labeled or marked clearly with one of the following phrases: “Universal Waste—Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”; and may only accumulate for periods of less than one year. | 40 CFR 273.13(d)(1);  40 CFR 273.14(e);  40 CFR 273.15(c) | Mark the storage boxes appropriately, maintain the storage boxes in a closed manner, and mark or label the container with the earliest date that any universal waste in the container became a waste or was received. | 03/2016 | Scott |
| Kuhn | Spent batteries are considered Universal Hazardous Waste and are being stored in a used product drum with the original product label (Photos 3496, 3497). There is no evidence that the spent batteries have been in accumulation for less than one year. Universal waste batteries (i.e., each battery), or a container in which the batteries are contained, must be labeled or marked clearly with any one of the following phrases: “Universal Waste—Battery(ies),” or “Waste Battery(ies),” or “Used Battery(ies)” and may only accumulate for periods of less than one year. | 40 CFR 273.14(a);  40 CFR 273.15(c) | Remove or paint over the original product label on the battery storage drum and mark the drum with the appropriate verbiage. Mark or label the drum with the earliest date that any universal waste in the container became a waste or was received. | 03/2016 | Scott |
| **Opportunities For Improvement** | | | | | |
| Lubrication Engineers | Employees are required to enter 350 gallon and 550 gallon totes in order to clean out the totes. The facility has determined that these totes are non-permit required confined spaces. The provisions of 1910.146(c)(5)(i)(B) to develop monitoring and inspection data is done with data that is 21 years old and consisted of taking readings from a four gas meter over a 4 ½ minute time span on seven representative totes. |  | Consider obtaining new data to support the decision to classify these totes as non-permit required confined spaces. Ideally, employees should be monitored for chemical exposure over an 8 hour time weighted average (TWA). | 03/2014 | Scott |
| Faultless | The Monarch lathe is tagged as being out of order but the equipment is still energized (Photo 39). |  | Consider permanently locking and tagging out the equipment. | 02/2015 | Scott |
| Collins Bus | There are several areas where material is hung on the valves of cylinders that are in use, possibly delaying valve closure in an emergency. |  | Consider implementing a policy to ban the use of cylinders for material storage. | 02/2015 | Scott |
| Electromech | The key for the safety gate On/Off switch for the mechanical power press is left in place at all times (Photo 67). |  | Consider a policy in which the supervisor maintains control of the key so that the safety gate cannot be turned to the Off position during operation. | 11/2015 | Scott |
| Perfekta | The Rockwell band saw located on the north dock has the saw blade guard in the upper position (Photo 50). |  | Ensure that the blade guard is moved to the lowest position when the band saw is not being used. | 02/2017 | Scott |
| Perfekta | The facility is concerned about increased forklift traffic in the facility and the potential injury to pedestrians. |  | Consider mounting blue forklift warning lights on the forklifts. The lights projects a blue light about 15 to 20 feet in front and in back of the forklift so that pedestrians are given advanced warning that a forklift is approaching. An example is included as Appendix J. | 02/2017 | Scott |
| CNH – Grand Island | The floor outside the upstairs paint booth in the waste water treatment area is covered with a protective covering (Photo 4608). |  | Determine if the covering is non-combustible and if so, switch to a non-combustible floor covering. | 04/2017 | Scott |
| Auto Craft | Combustible material is being stored directly next to the hot water heater (Photo 66). |  | Remove the combustible material and ensure that material is not stored within one foot of the hot water heater. | 06/2017 | Scott |
| Pegasus Labs | The fire evacuation procedures state that the facility will conduct evacuation drills on a semi-annual basis. A review of the documentation revealed that in three of the past five years, only one drill per year was conducted. |  | Although highly recommended, there is no OSHA requirement to conduct any evacuation or fire drills each year. However, the facility could be subject to a violation for not following their own plan. Either reduce the number of drills in the plan or ensure that all drills are conducted. | 08/2017 | Scott |
| Pegasus Labs | There are several areas where portable medical oxygen bottles are mounted to the wall (Photo 283). Administrating medical oxygen is considered medical treatment rather than first aid and therefore the case automatically must be recorded on the OSHA 300 injury log. Staff members indicated that the oxygen has rarely, if ever, used. |  | Remove the oxygen bottles from the facility and let outside medical emergency responders determine if medical oxygen is necessary. | 08/2017 | Scott |
| Pegasus Labs | There is a fire extinguisher sitting on top of a table (Photo 292). |  | Even though there is no OSHA standard prohibiting fire extinguishers from being located in an area like this (provided they are within the required height requirements), it is recommended that the fire extinguisher be mounted to a stable structure so that there is no possibility for it to be moved. | 08/2017 | Scott |
| Kansas Ethanol | An employee’s workstation is located underneath the storage racks subjecting personnel to potential falling objects from above (see Photo 2892). While there is no specific standard covering workstations installed within storage racks, OSHA could use the General Duty Clause to hold the employer responsible for failure to provide a work place free from recognized hazards if an object in storage struck an employee while working underneath storage racks. |  | Suggestion to move the workstation outside of the storage racks for better separation of work areas and overhead storage to reduce likelihood of falling objects striking personnel. | 11-7-18 | Curtis |
| Kansas Ethanol | Outside fire extinguisher was mounted to outdoor wall with inspection tag missing. |  | Recommend covering outside fire extinguisher with cover to protect integrity of fire extinguisher and also prevent loss of inspection tag. | 11-7-18 | Curtis |
| Kansas Ethanol | Employees are using dry cleaning methods (e.g. sweeping, compressed air) for dust control in the DDG Building which puts dust particulates into the breathing zone of employees. | 1910.1000 | Recommend completing industrial hygiene sampling to verify employees are not exceeding the permissible exposure limit for particulates not otherwise regulated (PNOR). Sampling should be completed during highest exposures. | 11-7-18 | Curtis |
| Kice Industries | Employees are wearing their own clothing during welding operations. |  | Considering providing flame resistant or non-melting materials (natural fibers or cotton) uniforms for employees who are involved in hot work operations. Or created policy that eliminates any meltable fibers, such as polyester, in clothing being worn by employees | 5-14-19 | Curtis |
| Excel Industries | Employees are wearing their own clothing during welding operations. |  | Considering providing flame resistant or non-melting materials (natural fibers or cotton) uniforms for employees who are involved in hot work operations. Or created policy that eliminates any meltable fibers, such as polyester, in clothing being worn by employees | 12-2-19 | Curtis |
| HOC | Metal shavings were observed around the electrical outlet behind the abrasive wheel grinder (see Photo 3583.) Metal shavings present a fire risk if contacted with conductors inside the outlet. |  | Suggestion to either move the abrasive wheel grinder or shield the shavings from hitting the outlet. | 5-28-19 | Curtis |
| Kansas Ethanol | Metal step stool and chair were located inside electrical room (see Photo 8). While not a citation, the easy location of the equipment makes it convenient for someone to use quickly if needed during servicing of electrical equipment. |  | Either restrict metal ladders and chairs from the electrical room or provide other non-conductive ladders and chairs to prevent possible electrical shock if someone were to use during electrical work. | 6-26-19 | Curtis Leiker |
| Kansas Ethanol | PPE hazard assessments are well documented but lack a true certification statement and signature. OSHA’s intent was for the document to be certified. | 1910.132(d)(2) | Add a statement on the PPE hazard assessments to certify the document as well as a signature. Example would be: “I, (name), (title), certify that the Kansas Ethanol facility has been assessed for workplace hazards that personal protective equipment can mitigate.” | 6-26-19 | Curtis Leiker |
| Hillsboro Industries | Industrial hygiene sampling results for welding operations should be evaluated for current levels of employee exposures to hazardous substances based on current facility processes and production rates. | 1910.132(d)(1)  1910.134(d)(1)(iii)  1910.1000 | If processes or production rates have changed, conduct additional industrial hygiene sampling to verify no permissible exposure limits are exceeded and no additional respiratory protection is required. | 7-10-19 | Curtis |
| Perfekta | Although not a mandatory requirement to post signs indicating high noise areas, it is a best practice to post warning signs in areas requiring hearing protectors. The employer is required to ensure hearing protectors are worn and personnel are aware of the requirement. | 1910.95(i)(2) | Common practice in industry to post warning signs of high noise areas to alert personnel going into areas with noise hazards. Post signs in conspicuous places where personnel would see requirement before entering designated high noise area. | 8/16/19 | Curtis |
| Perfekta | Facility is using an online system for SDS management. If there was a power failure, access to SDSs would not be available as there is not a back-up system in place. | 1910.1200(g)(1) | Ensure there is a back-up system such as a battery powered laptop with CD or flash drive with all the SDSs if paper copies are not provided. | 8/16/19 | Curtis |
| Excel Industries | Self-retracting lifeline is being stored in extended position on when not in use (see Photo 4914). The lifeline should not be kept in a extended position all the time as this can cause the retraction springs to eventually fatigue and the SRL may not function properly. | Manufacturer specifications | Keep the SRL stored with lifeline retracted during periods of non-use. | 12-2-19 | Curtis |
| Excel Industries | Several employees were observed in the painting areas with no hand protection from the painting material. | 1910.138(a)  1910.138(b) | Review all paint SDSs to validate no skin protection is required when using the chemicals and update PPE hazard assessment as applicable. | 12-2-19 | Curtis |
| Hillsboro Industries | The facility has several portable ladders used throughout the facility. While OSHA does not require a specific inspection frequency of ladders other than prior to use, it is best practice in industry to complete routine ladder inspections to minimize risk to employees of a ladder incident. OSHA’s walking / working surfaces standard requires performance based inspections of all walking / working surfaces. | 1910.22(d)(1) | Create an inventory of the portable ladders and complete routine inspections of all ladders. | 7-22-20 | Curtis |
| NPC  Goddard | Personnel at the facility use harnesses and lanyards for personal fall protection. There is no program in place to conduct a periodic inspection of all personal fall arrest equipment including self-retracting lifelines and fall protection harnesses and lanyards. Fall protection equipment should be inspected at a minimum of annually. While there is no specific OSHA standard covering harness inspections, OSHA can use the General Duty Clause, incorporating the ANSI standards, to hold employers responsible for personal fall protection inspections. | Section 5(a) of General Duty Clause;  ANSI Z359.2-2017 | Either train someone internally to provide competent periodic fall protection inspections or contract with an outside company to inspect all fall protection equipment at least annually. OSHA does not pro-actively cite employers for failing to do annual inspections on personal fall protection equipment, but it is common industry practice and OSHA may issue a citation if deemed necessary. | 8-26-2020 | Curtis |
| NPC Goddard | Lighting along the main forklift aisle in Building 1 can be very dim at times when the south and north overhead doors are not open (see Photo 14). | Risk Reduction Recommendation  Section 5(a)(1) of General Duty Clause | Add additional light fixtures along the forklift aisle to reduce potential of pedestrian accident. OSHA does not maintain general industry standards for amount of lighting in normal situations; however, they could use consensus standards to support a general duty clause citation if needed which would most likely be done after a serious accident.  For reference, the OSHA construction standard 1926.56 states a minimum of 5 foot-candles for indoor warehouses. | 4-23-21 | Curtis |
| Hillsboro Industries | Safety data sheets (SDSs) are maintained both electronically and by paper hard copies throughout the facility. | 1910.1200(g)(8) | To prevent occurrence of the hard copies not matching current revisions to the electronic system, it is recommended to put “for reference only” on the paper copy binders and state that the most current revisions are maintained on the electronic system. | 6-17-21 | Curtis |
| BG Products | Add cross bars on back side of industrial racking that is adjacent to employee work station | Recommendation  Section 5(a) of General Duty Clause |  | 7-27-21 | Curtis |
| BG Products | Shelter in place areas should not use “tornado” term unless rated. FEMA has developed standardized terminology to differentiate types of extreme-wind refuge areas from other types of shelters. Avoid using “storm shelter” and “safe room” as those need to meet certain design criteria. FEMA uses the term “best available refuge area” (BARA) for designated areas inside existing building that are least vulnerable to life-threatening effects of extreme wind. Suggest to use “shelter-in-place” signs. | Recommendation |  | 7-27-21 | Curtis |
| BG Products | Several pedestrian doors are directly under industrial storage racking. | Recommendation  Section 5(a) of General Duty Clause |  | 7-27-21 | Curtis |
| MPM | There are elevated noise levels for the employees in productions areas due to the use of compressed air nozzles, forklifts, CNC machines, and portable hand power tools. | 1910.95(d) | Conduct noise sampling for these job position to validate noise exposures do not exceed 85 dB as an 8-hr time-weighted average (TWA). | 8-23-21 | Curtis |
| MPM | There was no written evidence that an asbestos survey has been completed. There are buildings older than 1980 that may potentially contain asbestos. | 1910.1001(j)(3)(i) | Conduct an asbestos survey to determine the presence, location, and quantity of Asbestos Containing Material (ACM). | 8-23-21 | Curtis |
| MPM | Employees are storing heavy tooling onto compressed air lines (See Photo 54). |  | Create policy that prohibits storing tools onto utility lines and follow up with routine safety audits to verify safe work conditions are being maintained. | 8-23-21 | Curtis |
| MPM | Part storage is kept above the shipping office on shelving that does not have any backstop to prevent objects from falling to the level below where employees are working (See Photo 55). | Section 5(a)(1) of General Duty Clause | Either move shelving further inward or put up barrier such as netting to prevent objects from striking employees below in the event of a fall. | 8-23-21 | Curtis |
| Global Parts | A copy of Workers Compensation Rights and Responsibilities posted is from 2012 (See Photo 31). Due to injury reporting legal changes, a revision of April 25, 2013 or newer is required to reflect current State of Kansas law stating there are 20 calendar days to report while on the job and 10 calendar days to report after last day of work if no longer employed. | K.S.A. 44-520 | Remove old poster and place a newer form K-WC-40-A that is 2013 or newer. See Appendix L. | 8-19-21 | Curtis |
| Global Parts | Industrial hygiene sampling for spraying operations should be evaluated for current levels of employee exposures to hazardous substances based on current facility processes and production rates. | 1910.132(d)(1)  1910.134(d)(1)(iii)  1910.1000 | Have qualified industrial hygienist complete sampling on spraying operations to evaluate current employee exposures and validate correct respiratory protection is being worn. | 8-19-21 | Curtis |
| Global Parts | Although AED’s are not generally mandated to be part of a facility’s first aid supplies, the facility should still maintain and inspect them as required by the manufacturer. Currently the AED’s are not inspected frequently. | 1910.151(b)  LOI 6-17-2004 | Begin inspection of the AED’s and check for:   * Cleanliness, damage, wear. * Green status indicator. * Cracks or loose parts. * Electrodes within packaging and within expiration date. * Battery is within expiration date. * Stored in visible and easily accessible location.   Recommendation is monthly documented inspection. | 8-19-21 | Curtis |
| Pet-Ag | Employees are manually handling product containers and stacking onto pallets. | Recommendation | Purchase and use pallet positioners to improve ergonomics for employees. They make loading and unloading faster, easier, and safer by automatically lowering and raising the platform as material is added or removed and also turn to allow the nearside to always be used. | 9-14-21 | Curtis |
| Pet-Ag | While the facility does not have any critical plant operations that employees remain during emergencies, it would be best practice to state this in the emergency action plan (EAP). | Recommendation  1910.38(b) | Add a clause in the EAP stating the facility does not have any critical plant operations requiring employees to remain during emergency events. | 9-14-21 | Curtis |
| Pet-Ag | Employees are cutting and dumping bags of food ingredients into the blenders in Production which puts dust particulates into the breathing zone of employees. | 1910.1000 | Recommend completing industrial hygiene sampling to verify employees are not exceeding the permissible exposure limit for particulates not otherwise regulated (PNOR). Sampling should be completed during highest exposures. | 9-14-21 | Curtis |
| Capps | While the boiler received its annual inspection, the certificate of inspection posted expired 10-13-21 (See Photo 27). | K.A.R. 49-50-23 | Post the new certificate of inspection in the boiler room under a clear covering on the boiler room wall in a conspicuous location. | 1-12-22 | Curtis |
| Capps | A small pipe in the boiler room is located very close to the floor and has almost the same color as the floor providing very little contrast to easily identify the trip hazard (See Photo 28). | 1910.22(a)(3) | Paint the pipe a bright color or provide another method of increasing the contrast between the pipe and floor to prevent an accidental trip. | 1-12-22 | Curtis |
| Capps | Access to the large spill kit is currently restricted with a one-time use lock (See Photo 29). While this is beneficial for inventory control, it could impede timely access to spill control equipment in the event of a hazardous substance release. | 1910.120(q) | Recommend to use a tamper proof seal that can be used for inventory control but not restrict access to the spill kit in the event of an emergency. | 1-12-22 | Curtis |
| Capps | The only hand washing station for employees exposed to hexavalent chromium is a long distance away from the regulated area. OSHA’s intent and recommendation is to have a handwashing station adjacent to the work area for employees. | 1910.1026(i)(1) | Install a handwashing station closer to the hexavalent chromium regulated area. If this is not feasible, it relies heavily on the employees to walk over to the one hand washing station to wash their hands before doing other activities. Employees must wash their hands before eating, drinking, or doing other personal activities. | 1-12-22 | Curtis |
| Capps | There is no evidence of surface sampling taken for eating and drinking areas to validate hexavalent chromium is not present on those surfaces. | 1910.1026(i)(4)(i) | It is recommended to validate eating and drink surfaces do not contain hexavalent chromium. OSHA automatically assumes housekeeping programs are not sufficient is they detect any amount. | 1-12-22 | Curtis |
| Pet-Ag | There is only limited amounts of emergency lighting provided in the facility located in towards the interior of the facility. | 1910.37(b)(1) | Complete a lighting survey to determine if during a power outage and dark conditions (e.g. during storms or before sunrise) that employees with normal vision will be able to see along the exit routes. OSHA uses NFPA 101 for guidance which section 7.9 states emergency lighting should average 1.0 foot-candle and never less than 0.1 foot-candle at any point along the path of egress. | 5-25-22 | Curtis |
| Pet-Ag | The holding tank for waste liquid product is not labeled (See Photo 15). | 1910.1200(f)(6);  1910.1200(f)(6)(ii)  Letter of Intrepretation 10-15-2015 | Although waste products are not under the jurisdiction of OSHA, it is recommended to label waste containers with the identification of the contents. | 5-25-22 | Curtis |

**Master Environmental Audit Matrix**

| **Facility** | **Condition** | **Regulatory Standard** | **Corrective Action To Be Taken** | **Audit Date** | **Auditor** |
| --- | --- | --- | --- | --- | --- |
| **Air Quality – Chapter I Subchapter C – Air Programs (40 CFR 50-98)** | | | | | |
| Hillsboro | A current potential-to-emit (PTE) calculation could not be retrieved. | Recommendation  K.A.R. 28-19-300 | Ensure a PTE calculation is available, current, and that all emission units are accounted for. A newer spray booth might potentially be put in facility in the near future and a PTE calculation would be done at this time as well. | 6-17-21 | Curtis |
| Global Parts | A spray booth is currently in operation and an emergency generator is being installed soon. A current potential-to-emit (PTE) calculation could not be retrieved for an air permitting determination. | Recommendation  K.A.R. 28-19-300 | Although the buildings have few air emission units that are regulated for air permitting, a PTE calculation should be maintained that is available, current, and that all emission units are accounted for to validate air emissions are below permitting thresholds and no other permitting rules are overlooked. | 8-19-21 | Curtis |
| USD259 | Several paint booths, boilers, and generators were observed throughout the facility. | K.A.R. 28-19-500 | At a minimum a potential-to-emit calculation should be completed in order to determine if the facility is a source for air emissions that would require an air permit. | 7-30-18 | Amanda |
| Hillsboro | A paint booth, boiler, and dust collection system were observed at the facility. A current potential-to-emit (PTE) calculation could not be retrieved. It was observed that the boiler was not listed within the permit. | K.A.R. 28-19-301 | Ensure the PTE calculation is available, current, and that all emission units are accounted for. | 7-10-19 | Bria |
| Pet-Ag | A current potential-to-emit (PTE) calculation could not be retrieved for an air permitting determination. The facility has minimal air emission sources such as dry ingredient blending and miscellaneous natural gas sources but formal documented justification should be completed. | Recommendation  35 IAC 201 | Although the building has few air emission units that are regulated for air permitting, a PTE calculation should be maintained that is available, current, and that all emission units are accounted for to validate air emissions are below permitting thresholds and no other permitting rules are overlooked. | 9-14-21 | Curtis |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Bridgeport, WV |  | 40 CFR 60.4243(a)(1), 60.4245(a)(2) and (b), adopted by reference at 45 CSR 16-1.1 |  | April 2018 | Golder |
| Learjet – Hartford | Painter training and certification records related to the Paint Stripping and Miscellaneous Surface Coating Operations NESHAP (subpart HHHHHH) were not available. | 40 CFR 63.11173(f) and 63.11177(a) |  | 2017 | Golder |
| Learjet – Wichita | Diesel and natural gas-fired generator run-time hours were logged by Maintenance, but there was no indication on the hour records of the reason for operation (emergency versus non-emergency). In addition, diesel fire pump run-times hours could possibly be calculated from hour meter notations on maintenance records but run-time hours along with the reason for operation (emergency versus non-emergency have not been recorded. | Kansas Class I Operating Permit, Source ID 1730052, Sections VI.H.1.k.iii, VI.I.1.f.ii, and VI.J.1.j.iii  40 CFR 63.6655(f) | Owners and operators of stationary reciprocating internal combustion engines (RICE) must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. | 2016 | Golder |
| Learjet – Wichita | Diesel and natural gas-fired emergency generator run-time hours were logged for emergency operation, but there were no records available of operating hours for testing and maintenance. | Kansas Class I Operating Permit, Source ID 1730052, Sections VI.H.1.k.iii, VI.I.1.f.ii, and VI.J.1.j.iii  40 CFR 63.6655(f) | Owners and operators of stationary reciprocating internal combustion engines (RICE) must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. | June 2019 | Golder |
| Learjet – Fort Lauderdale |  | 40 CFR 63.6655(f) |  | October 2017 | Golder |
| Learjet – Tucson, AZ |  | 40 CFR 63.6660  Air Quality Operating Permit 825, Part B, Section XI.B and XI.G |  | August 2017 | Golder |
| Learjet – Tucson, AZ | Records of corrective actions from boiler and process heater tune-ups were available for three units, but not for the other 10 units subject to the requirement | 40 CFR 63.7540(a)(10)  Air Quality Operating Permit 825, Part B, Section X.A.1 |  | 2017 | Golder |
| Learjet – Wichita | Maintenance is completed on natural gas-fired boilers and ovens, but the testing completed and records maintained do not include all the items required by the air permit and associated regulations. For example, no records of effluent carbon monoxide and oxygen concentrations were available. Compliant tune-ups were required by 1-31-13 for boiler 10 and 1-31-16 for all other boilers and process heaters (ovens). In addition, a Notification of Compliance Status Report is required within 60 days of initial tune-up. | 40 CFR 63.7495(b)  40 CFR 63.7500(a)(1)  40 CFR 63.7450  40 CFR 63.7510(e)  40 CFR 63.7530(e) and (f)  Kansas Class I Operating Permit, Source ID 17300052, Sections……. | An initial tune-up must be completed no later than 1-13-13 for boiler 10 and 1-31-16 for all other boilers and process heaters on-site. The tune-up must be completed as described at 40 CFR 63.7540(a)(10)(i)-(vi). A notification of compliance status report must be submitted within 60 days of the initial tune-up. | 2016 | Golder |
| CK Technologies – Brownsville, Texas | Painter training and certification records related to the Paint Stripping and Miscellaneous Surface Coating Operations NESHAP (Subpart HHHHHH) were not available. | 40 CFR 63.11173(f)  40 CFR 63.11177(a) | Each owner or operator of an affected miscellaneous surface coating source must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings, as defined in 63.11180, are trained in the proper application of surface coatings. Training must be completed within 180 days of new hire for certification. Training and certification is valid for a period not to exceed 5 years. Training must include both classroom instruction and hands-on instruction. (See Appendix B). | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The site is subject to the NESHAP Subpart 6H, but did not have record for an initial notification of applicability for the facility and notification of compliance status to the EPA and TCEQ. | 40 CFR 63.11175 | All sources must submit an initial  notification to the EPA or to their State  or local air pollution control agency, if  the EPA has delegated authority for  implementing this rule to that agency,  with a copy sent to EPA, unless the EPA  regional office has waived the dual  reporting requirements.  New sources need to submit the initial notification no later than 180 days after initial startup, or no later than 180 days after the date of this notice, whichever is later. A notification of compliance must also be submitted and is meant to be included with the initial notification for new sources. (See Appendix C). | 3-2-21 | Curtis |
| Max | The site is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) Subpart HHHHHH (6H), but did not have record for an initial notification of applicability for the facility and notification of compliance status to the Environmental Protection Agency (EPA) and Kansas Department of Health and Environment (KDHE). | 40 CFR 63.11175 | All sources must submit an initial notification to the EPA and KDHE. New sources need to submit the initial notification no later than 180 days after initial startup. Existing sources were to submit initial notification before 1-11-2010 and notification of compliance by 3-11-2011. | 11-24-21 | Curtis |
| Max | The site is subject to the NESHAP Subpart WWWWWW (6W), but did not have record for an initial notification of applicability for the facility and notification of compliance status to the EPA and KDHE. | 40 CFR 63.11509 | All sources must submit an initial notification and notification of compliance status to the EPA and KDHE upon start-up. Compliance date for existing sources was 7-1-2010 and new sources must submit upon start-up. | 11-24-21 | Curtis |
| Max | The site has not prepared an annual certification of compliance report for NESHAP Subpart 6W. | 40 CFR 63.11509(c) | Create an annual certificate of compliance report, which must be prepared no later than January 31 of the year immediately following the reporting period. These reports do not need to be submitted unless a deviation from the requirements occur. | 11-24-21 | Curtis |
| USD259 | Several old refrigerators were observed outside (photo 35). | 40 CFR 82 Subpart A, B, E, F and G | The facility is required to keep a record of all paperwork relevant to the applicable requirements, including but not limited to; servicing of motor vehicle air conditioners, labeling of products using ozone-depleting substances, warning statement requirements, recycling and emission reduction, technician certification, reporting and recordkeeping requirements. | 7-30-18 | Amanda |
| Learjet – Wichita | The site has refrigerant-containing devices, such as chillers, that have a full-charge capacity greater than 50 pounds of refrigerant. Leaks have occurred on some of the equipment, but annual leak rate calculations have not been documented to determine the timeframe in which leaks must be repaired. Documentation of time to repair leaks was also not available so verification of compliance with the leak repair standard cannot be verified. | 40 CFR 82.156(i)(1) | Owners/operators of refrigeration and air-conditioning equipment with refrigerant charges greater than 50 pounds are required to repair leaks within 30 days when those leaks would release 35% or more of the charge over a year (projected on a 12-month basis). To track leak rates, the facility must keep servicing and quantity of refrigerant added to the equipment. | 2016 | Golder |
| Learjet – Wichita | The site has refrigerant-containing devices, such as chillers, that have a full-charge capacity greater than 50 pounds of refrigerant. Work order records were available for maintenance and servicing of the equipment, including for refrigerant leaks that have occurred. However, the records did not include all of the information required by the regulation. Specifically, the maintenance records did not include:  - The full charge of the appliance  - The leak rate and the method used to determine the leak rate | 40 CFR 82.157 | Owners or operators must maintain a record including the following information for each time an appliance with a full charge of 50 or more pounds is maintained, serviced, repaired, or disposed of, when applicable:  - The identity and location of the appliance;  - The date of the maintenance, service, repair, or disposal performed  - The part(s) of the appliance being maintained, serviced, repaired, or disposed  - The type of maintenance, service, repair, or disposal performed for each part  - The name of the person performing the maintenance, service, repair, or disposal  - The amount and type of refrigerant added to, or in the case of disposal removed from, the appliance  - The full charge of the appliance  - The leak rate and the method used to determine the leak rate | June  2019 | Golder |
| Learjet – Hartford | Certification records were not available for employees completing work on refrigerant-containing equipment. | 40 CFR 82.161(a)(1) and (a)(4)(i) |  | 2017 | Golder |
| Learjet – Dallas | The site has refrigerant recovery equipment that is occasionally used by employees for work on aircraft air conditioning units. Certification records were not available for two employees who may do refrigerant-related work | 40 CFR 82.161(a)(1) and (4) | Any person who could be reasonably expected to isolate the integrity of the refrigerant circuit during the maintenance, service, repair, or disposal of appliances containing a class I or class II refrigerant or a non-exempt substitute refrigerant must pass a certification exam offered by an approved technician certification program.  Technicians certified under this section must keep a copy of their certificate at their place of business. Technicians must maintain a copy of their certificate until three years after no longer operating as a technician. | Sept 2019 | Golder |
| Excel Industries | The facility maintains a natural gas-fired emergency generator on site; however, no notification to KDHE has taken place. The facility is subject to NESHAP 4Z, as well as NSPS 4J. |  | Complete the necessary forms and notify KDHE of the emergency generator. Also, ensure the following management practices and recordkeeping are being followed:  1) Changing oil and filter every 500 hours of operation or annually, whichever comes first, or conduct an oil analysis;  2) Inspecting air cleaner every 1,000 hours of operation or annually, whichever comes first;  3) Inspecting all hoses and belts every 500 hours of operation or annually, whichever comes first;  4) Must develop maintenance plan that specifies management practices will be met and records proving they are being completed; and,  5) Must maintain records of hours of operation. Required to install non re-settable hour meter on engine. | 10-27-16 | Nikki |
| FACC | No PTE evaluation was conducted, nor was the required construction approval/permit application submitted to KDHE prior to installation of the paint booth, blast booth, and oven. |  | iSi recommends conducting a PTE evaluation, as well as submitting the required construction approval/permit for the paint booth, blast booth, and oven. If a dust collection unit is still going to be installed, this should be included in the construction approval/permit submittal, as well as the applicability to 40 CFR Part 63 Subpart HHHHHH. | 2-9-15 | Nikki |
| FACC | No notifications have been submitted to KDHE or EPA related to 40 CFR Part 63 Subpart HHHHHH. |  | Notifications required under 40 CFR Part 63 Subpart HHHHHH should be submitted to both KDHE and EPA as soon as possible. iSi recommends submitting the notification along with the construction approval/permit application to KDHE. Please note that a copy of the notification only will need to be submitted to EPA as well. | 2-9-15 | Nikki |
| FACC | No painter training/certification has been completed. |  | Ensure all painters are trained/certified in both classroom and hands-on within 180 days, as required. Painters must also be re-certified in both classroom and hands-on every 5 years. | 2-9-15 | Nikki |
| FACC | HVLP spray guns are being utilized; however, no spray gun specifications or spray booth filter specifications were on file. |  | Ensure specifications for both spray guns and spray booth filters are maintained on file. Spray guns must be HVLP or equivalent and spray booth filters must be at least 98% efficient. | 2-9-15 | Nikki |
| Learjet – Wichita | Records of opacity assessments were not available prior to November 2015 or after January 2016 | Kansas Class I Operating Permit, Source ID 17300052, Section IX | Qualitative assessments of opacity must be completed at least once per calendar month, with at least one week between assessments. The assessments shall include each activity at the facility operating at the time of the assessment. | 2016 | Golder |
| Learjet Wichita | Records of opacity assessments were not available for September 2018. | Kansas Class I Operating Permit, Source ID 1730052,  July 11, 2018 revision,  Section IX | Qualitative assessments of opacity must be completed at least once per calendar month, with at least one week between assessments. The assessments shall include each activity at the facility operating at the time of the assessment. | June 2019 | Golder |
| Learjet Wichita | In the annual Class I Operating Permit compliance certification for 2016, the site identified non-compliance with 40 CFR 63 Subpart DDDDD for boilers and process heaters but listed no other non-compliances. The 2016 Legal Compliance Audit identified three other non-compliances related to compliance with permit and regulatory requirements for emergency engines, opacity monitoring, and refrigerants management. The additional non-compliances were not identified in the compliance certification as required.  Similarly, the January through June 2016 semiannual report submitted on July 26, 2016 only identified the boiler and process heater non-compliance. The non-compliances related to emergency engines and opacity monitoring (conditions subject to semiannual reporting) identified during the 2016 Legal Compliance Audit were not identified in the semiannual report. | Kansas Class I Operating Permit, Source ID 1730052,  July 11, 2018 revision,  Section XIV.G | Annual Certification  The permittee shall annually submit to the Air Compliance and Enforcement Section of the KDHE, and a copy to the Air Permitting and Compliance Branch of the U.S. EPA, Region VII, a certification of compliance.  The certification shall include the permit term or condition that is the basis of the certification; the current compliance status; whether compliance was continuous or intermittent; the method or methods used for determining the compliance, currently and over the reporting; and such other facts as the KDHE may require to determine the compliance status of the source.  Semi-Annual Reports  Summary reports of any routine, continuous, or periodic monitoring must continue to be submitted at six-month intervals for the duration of the permit. All instances of deviations from permit requirements, including perceived opacity exceedances, shall be clearly identified in the report. All reports shall be certified by a responsible official. | June 2019 | Golder |
| Learjet – Bridgeport WV |  | Air Emissions Permits R13-2236B, Section 4.3.4 |  | April 2018 | Golder |
| Learjet – Dallas | The site has one diesel-powered emergency generator (288 HP) and three diesel-powered fire pumps (275 HP each). Records were not available to demonstrate that the site had registered for coverage under the Texas Stationary Engines and Turbines Permit-by-Rule | 30 TAC 106.512(1) | The facility shall be registered by submitting the commission’s Form PI-7, Table 29 for each proposed reciprocating engine to the commission’s Office of Permitting, Remediation, and Registration in Austin within 10 days after construction begins. Engines and turbines rated less than 240 HP need not be registered, but must meet paragraphs (5) and (6) of this section, relating to fuel and protection of air quality. | September  2019 | Golder |
| CK Technologies – Brownsville, Texas | Quarterly records of opacity assessments were not being completed. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 5(B) | Qualitative assessments of opacity must be completed at least once per quarter. The assessments shall include each listed emission point at the facility operating at the time of the assessment. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The differential pressure gauge drop readings are not being recorded on a daily basis when the coating booths are in use. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 10(E) | Record the pressure drop readings at last once per day when the system is required to be operated. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | There was not evidence that a quarterly accuracy audit is being completed on the thermal oxidizer. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 13(C) | Begin completing and documenting a quarterly accuracy audit to validate the temperature sensors are accurate to within ± 5°F. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | Operating instructions to the thermal oxidizer are available to operators but not in immediate work area. | Recommendation  Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 13(E) | Suggestion to place operating instructions / manual immediately available in area for thermal control device operators. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | A monthly audio, visual, and olfactory (AVO) inspection of the thermal oxidizer capture system is not being completed. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 13(G) | Begin completing and documenting a monthly inspection of the capture system to check for leaking components. The inspection requirement is meant to ensure the capture system is working efficiently. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The hours of operation for the combustion equipment is limited to 7488 hours per year, but no direct documented evidence is immediately available to demonstrate this requirement. | Texas Commission on Environmental Quality Air Permit 135418, revision November 30, 2018, Section 16 | Create a document or other formal system to show that the combustion equipment is not exceeding this operational limitation and make readily available if inspected by EPA or TCEQ. | 3-2-21 | Curtis |
| Learjet – Tucson, AZ | Acceptable pressure drop readings are posted near booths used for sanding, but the acceptable limits are not listed on the paper logs or in the ERA system as is required by the permit. | Air Quality Operating Permits 825, Part B, Section II.E.2 | The permittee shall record the actual pressure drop across the particulate filters once each shift in which the depainting process is in operation. This log shall include the acceptable limit(s) of the pressure drop as specified by the filter manufacturer or in locally prepared operating procedures. | August 2017 | Golder |
| Learjet – Tucson, AZ | Stationary rotating machinery exhaust stack opacity records were available for 2016 and 2017 but not for previous years 2013-2015 | Air Quality Operating Permit 825, Part B, Section XII.E.2 | For each opacity check conducted pursuant to D.2 of this section (monitoring for Opacity Emissions Standards), the Permittee shall record the date and time of the check, the name of the person conducting the check, the results of the check, and the type of corrective action taken (if required). All records shall be maintained for 5 years. | August 2017 | Golder |
| Cascade Engineering – Grand Rapids, MI Part 1 | A current potential-to-emit (PTE) calculation could not be retrieved. | Recommendation | Although the facilities have few air emission units that are regulated for air permitting, a PTE calculation should be maintained that is available, current, and that all emission units are accounted for to validate air emissions are below permitting thresholds and no other permitting rules are overlooked. | 2-18-21 | Curtis |
| Hillsboro | Greenhouse gas (GHG) applicability determination was not on file. | Recommendation | iSi recommends conducting GHG calculations in order to determine the actual CO2e emissions from combustion equipment. | 7-10-19 | Bria |
| CK Technologies – Brownsville, Texas | Greenhouse gas (GHG) applicability determination was not on file. | Recommendation  40 CFR 98 | iSi recommends conducting GHG calculations in order to determine the actual CO2e emissions from combustion equipment. The threshold limit is 25,000 metric tons of CO2e per year. The facility is assumed to be below the threshold if the maximum-rated heat-input capacity for all stationary fuel combustion equipment combined is less than 30 million British thermal units (MMBtu) per hour. | 3-2-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | Greenhouse gas (GHG) applicability determination was not on file. | Recommendation  40 CFR 98 | iSi recommends conducting GHG calculations in order to determine the actual CO2e emissions from combustion equipment. The threshold limit is 25,000 metric tons of CO2e per year. The facility is assumed to be below the threshold if the maximum-rated heat-input capacity for all stationary fuel combustion equipment combined is less than 30 million British thermal units (MMBtu) per hour. | 4-14-21 | Curtis |
| Hillsboro | Greenhouse gas (GHG) applicability determination was not on file. | Recommendation  40 CFR 98 | iSi recommends conducting GHG calculations in order to determine the actual CO2e emissions from combustion equipment. The threshold limit is 25,000 metric tons of CO2e per year. The facility is assumed to be below the threshold if the maximum-rated heat-input capacity for all stationary fuel combustion equipment combined is less than 30 million British thermal units (MMBtu) per hour. | 6-17-21 | Curtis |
| Ultra Clean Midwest | At the time of the audit, a current potential-to-emit (PTE) calculation could not be retrieved. An evaluation against any applicable National Emission Standards for Hazardous Air Pollutants (NESHAP) subparts needs to be evaluated as well. | Recommendation  10 CSR 10-6  40 CFR 63 Subpart N  40 CFR 63 Subpart WWWWWW (6W) | Ensure a PTE calculation is available, current, and that all emission units are accounted for. Evaluate the facility processes against any applicable NESHAP standards such as Subparts N (chromium electroplating) and WWWWWW (6W) (plating and polishing operations). | 12-8-21 | Curtis |
| **Spill Prevention Control and Countermeasures (SPCC) – Chapter I Subchapter D – Water Programs (40 CFR 112) Oil Pollution Prevention** | | | | | |
|  |  |  |  |  |  |
|  |  |  |  |  |  |
| USD259 | A Spill Prevention Control and Countermeasure (SPCC) plan was found on file in draft format but never was reviewed or signed by a Professional Engineer (P.E.). | 40 CFR 112 | Any facility that has 1,320 gallons of above ground storage or 42,000 gallons in underground storage must have a SPCC developed. The facility needs to re-evaluate the amount of petroleum or oil-like products that are stored on-site in aboveground tanks and underground tanks and have an updated plan developed and certified by a P.E. Monthly and annual inspection as well as annual training will be required once plan is developed. | Amanda | 7-30-18 |
| CK Technologies – Brownsville, Texas | The facility has a 1,000 gallon AST and a 300 gallon portable tank of hydraulic fluid. The facility also has four totes of oily wastewater that are used for storage prior to hauling off site for disposal that puts the facility over the limit of 1,320 gallons above ground oil storage capacity requiring a SPCC plan. | 40 CFR 112.1(b)  40 CFR 112.3  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 2.2.6 | Develop a SPCC Plan for the facility. Oil and water mixture containers are subject to the SPCC rule. A mixture of wastewater and oil is “oil” under the statutory and regulatory definition of the term. | 3-2-2021 | Curtis |
| CK Technologies – Mount Airy, North Carolina | The facility typically stores approximately twenty 55-gallon drums of solvents and oil based paints along with eight to nine 55-gallon drums of hazardous wastes that contain oil components. This puts the facility over the limit of 1,320 gallons for above ground oil storage capacity requiring a SPCC plan. | 40 CFR 112.1(b)  40 CFR 112.3  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 2.2.8 | Develop a SPCC Plan for the facility. Hazardous waste containers are subject to the SPCC rule. The definition of “oil” includes but is not limited to “oil mixed with wastes other than dredged spoil.” Oils covered under the SPCC rule include certain hazardous substances or hazardous wastes that are oils as well as certain hazardous substances or hazardous wastes that are mixed with oils. | 4-14-21 | Curtis |
| Pet-Ag | Vegetable oil containers are stored on the property in totes and 55-gallon drums, totaling approximately 12,000 gallons of total oil volume in inventory. Accounting for all these oil containers, Pet-Ag is storing oil in excess of 1,320 gallons aboveground oil storage. The facility is located within ¼ mile of an intermittent tributary to Coon Creek. The determination of reasonable expectation of discharge to a navigable water is based solely upon consideration of the geographical and location aspects of the facility and excludes consideration of manmade features such as dikes, equipment, or other structures, which may serve to restrain, hinder, contain, or otherwise prevent a discharge. Thus, the facility requires an SPCC plan. | 40 CFR 112.1(b)  40 CFR 112.3  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 2.6.2 | Develop a SPCC Plan for the facility that is certified by a Professional Engineer (PE). See Appendixes D and E. | 9-14-21 | Curtis |
| Max | The facility has numerous totes of metal working fluids (See Photo 9), 55-gallon drums of oil products (See Photo 10), and oil reservoirs in oil-filled operational equipment in the facility that puts the facility over the limit of 1,320 gallons above ground oil storage capacity requiring a SPCC plan. | 40 CFR 112.1(b)  40 CFR 112.3 | Complete a full inventory of oil containers that are 55-gallons and larger that are maintained on the property to calculate a total volume of oil storage. The total container capacity must be used, just not amount of liquid in the containers. Develop a SPCC Plan for the facility. If exceeding 10,000-gallons, develop a non-qualified SPCC plan that is certified by a Professional Engineer (P.E.). | 11-24-21 | Curtis |
| Learjet – Fort Lauderdale |  | 40 CFR 112.1(b)(2(ii) and 112.3 |  | October 2017 | Golder |
| Cascade Engineering, Montpelier, Ohio | The facility is using nine totes for oily wastewater storage that are not included in the SPCC plan (See Photo 1). | 40 CFR 112.1(b)  40 CFR 112.3  40 CFR 110.2  40 CFR 112.2  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 2.2.6 | Update the SPCC plan to include all totes used for storage of oily wastewater. Oil and water mixture containers are subject to the SPCC rule. A mixture of wastewater and oil is “oil” under the statutory and regulatory definition of the term. See Appendix H. | 12-16-21 | Curtis |
| BG Products | Suggestion to do additional review on oil containers in facilities. Many facilities can overlook less common oil containers in their inventory assessment. | Recommendation  40 CFR 112.1(b)  40 CFR 112.3 | Validate all oil inventory is accounted for by assessing:   * Hazardous waste drums containing oil or oil mixtures * Hydraulic oil reservoirs on elevators and trash compactors | 8-19-22 | Curtis |
| Cascade Engineering, Grand Rapids, MI | The Noble facility exceeds 10,000 gallons of oil storage onsite and the current revision of the SPCC plan covering the Noble facility is not certified by a licensed Professional Engineer (P.E.). | 40 CFR 112.3(d) | Have the SPCC plan reviewed and certified by a licensed Professional Engineer who attests:   1. He/she is familiar with the requirements of 40 CFR 112. 2. He/she or his/her agent visited and examined the facility. 3. The plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards. 4. Procedures for required inspections and testing have been established. 5. The plan is adequate for the facility. | 6-24-22 | Curtis |
| Atlas | The SPCC Plan is current as of October 2017; however, the Plan will need to be updated again due to continued equipment moves/additions. | 40 CFR part 112.5(a) | Once the equipment moves/additions are complete, iSi will update the Plan. | Bria | 5-9-18 |
| Learjet – Bridgeport, WV |  | 40 CFR 112.7, 112.20(e) and Appendix C to Part 112 |  | April 2018 | Golder |
| Learjet - Hartford | An elevator is located near the Stock Room. Based on information provided by the elevator service company, the hydraulic reservoir associated with the elevator has a capacity of 130 gallons. The reservoir is not included in the site's SPCC Plan. In addition, the SPCC Plan inventory does not include 115-gallon bowsers used to collect jet fuel (only describes 55-gallon portable containers). | 40 CFR 112.7(a)(3)(i) |  | 2017 | Golder |
| Learjet – Dallas | Based on measurements taken during the audit, the elevator hydraulic reservoir appears to have a capacity of approximately 142 gallons. The reservoir is not included in the site’s SPCC Plan. | 40 CFR 112.7(a)(3)  40 CFR 112.1(d)(5) | Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each fixed oil storage container and the storage area where mobile or portable containers are located.  SPCC plans must address containers 55 gallons in capacity and larger. | Sept 2019 | Golder |
| Cascade Engineering – Montpelier, Ohio | The SPCC plan dated 1-31-20 has a facility map provided but does not include a facility diagram with all the requirements including:   * Location of each oil storage container   Transfer stations | 40 CFR 112.7(a)(3)  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 6.4 | Update the facility map and mark the locations and contents of each fixed oil storage container and storage areas where mobile or portable containers are located. Recommended to show on the map the locations of all spill kits. See Appendix I. | 12-16-21 | Curtis |
| BG Products | The facility diagrams for both facilities are relatively compact in size due to covering large areas. The intent of the SPCC facility diagrams is to mark the location and contents of each fixed oil storage container, the storage area for mobile and portable containers, and the location of connecting piping and intra-facility gathering lines. The level of detail is at the discretion of the person certifying the SPCC Plan. The maps are also only in black and white, which makes seeing the important features on the diagram hard to see. | Recommendation  40 CFR 112.7(a)(3) | Suggestion to create a more focused facility diagram where:   * Individual oil containers can be uniquely identified * Mobile and portable are located * Connecting piping and intra-facility gathering lines can be included. Piping might still need to be reference in SPCC Plan on exact location of full detailed diagrams as this feature is usually hard to show in an SPCC plan.   Suggestion to leave facility structure in black font color, while using bright colors to mark important features required by the SPCC rule to allow easy viewing. | 8-19-22 | Curtis |
| Learjet – Hartford | The emergency contact list in the SPCC Plan was not up-to- date and included people no longer at the site. | 40 CFR 112.7(a)(3)(vi) |  | 2017 | Golder |
| Learjet – Wichita | No record of monthly SPCC inspections were available for September 2018. | 40 CFR 112.7(e)  Bombardier SPCC Plan,  June 21, 2018, Section 4.4.2 | Regulation  Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years.  SPCC Plan  The checklist in Appendix C [of the SPCC Plan] is used for monthly inspections by the Emergency Coordinator, or designee. Written monthly inspection records are signed by the Emergency Coordinator and maintained with this Plan for a period of three years. | June 2019 | Golder |
| Cascade Engineering – Montpelier, Ohio | Frequent visual inspections are being completed using the facility’s safety audit form and are not described in the SPCC plan. The SPCC plan must describe the inspections and tests required with written procedures. Inspection records must be kept for a period of 3 years. | 40 CFR 112.7(e);  40 CFR 112.8(c)(6) or  40 CFR 112.12(c)(6)  SPCC Guidance for Regional Inspectors, Revision 12-16-2013, Section 7.2.1 | Update the SPCC plan to include the appropriate written procedure for completing frequent visual inspections. The plan must provide an appropriate inspection form to use. Records of inspection must be kept for a period of 3 years. See Appendix J. | 12-16-21 | Curtis |
| BG Products | Facilities are currently completing three levels of frequent and periodic inspections;   * Monthly - equipment * Quarterly – tank vents and tank exterior   Annually – tank foundations and anchor bolts | Recommendation  40 CFR 112.7(e) | To reduce time needed to complete inspections, it might be possible to combined inspection requirements into fewer levels. | 8-19-22 | Curtis |
| BG Products | The facilities’ inspection checklists are not located within the SPCC Plan. | Recommendation  40 CFR 112.7(e) | Place a blank copy of all inspection forms into the SPCC Plan for better document control and review. | 8-19-22 | Curtis |
| Atlas | Annual training records for 2018 could not be located at the time of the audit. | 40 CFR part 112.7(f) | SPCC training is required annually for oil-handling personnel. Ensure training is conducted and documented. | Bria | 5-9-18 |
| Learjet – Bridgeport, WV |  | 40 CFR 112.7(e) and SPCC plan, 9/16/2018 revision, Section 4.7 |  | April 2018 | Golder |
| Perfekta | The facility maintains an SPCC plan but is not completing trainings to applicable employees as required. Employees that are considered oil-handling personnel are required to have initial training that covers operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. Annually thereafter, employees must be briefed to assure adequate understanding of the SPCC plan to describe known discharges, failures, malfunctioning components and any recently developed precautionary measures. | 40 CFR 112.7(f)(1)  40 CFR 112.7(f)(3) | Ensure all oil-handling personnel are adequately training initially and annually thereafter. | 7-27-22 | Curtis |
| BG Products | The facilities are completing initial SPCC trainings to applicable employees as required; however, not all required elements are covered. Employees that are considered oil-handling personnel are required to have initial training that covers:   * Operation and maintenance of equipment to prevent discharges, * Discharge procedure protocols, * Applicable pollution control laws, rules, and regulations, * General facility operations, and,   The contents of the facility SPCC Plan. | 40 CFR 112.7(f)(1) | Update training presentation to ensure all oil-handling personnel are adequately trained initially with all required content. | 8-19-22 | Curtis |
| Learjet – Hartford | Records of annual oil discharge briefings were not available for 2016. Records from 2015 and 2017 were available | 40 CFR 112.7(f)(3) |  | 2017 | Golder |
| BG Products | The facilities are not completing annual briefings (i.e. trainings) to applicable employees. After initial training, employees on an annual basis must be briefed:   * To assure adequate understanding of the SPCC plan, and,   To discuss known discharges, failures, malfunctioning components and any recently developed precautionary measures. | 40 CFR 112.7(f)(3) | Begin completing annual refresher briefings or trainings to applicable oil-handling employees at the facilities. | 8-19-22 | Curtis |
| BG Products | While the facility is using wheel chocks on tank trucks loading/unloading oil products, this is not stated in the SPCC plan. | 40 CFR 112.7(h)(2) | Add the required verbiage in the SPCC plan stating wheel chocks are required to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines. | 8-19-22 | Curtis |
| Learjet – Tucson, AZ | 55-gallon oil drums stored in the maintenance building were observed being stored without adequate containment | 40 CFR 112.8(c)(2)  Bombardier SPCC Plan, August 2016, Section 15.3.2 | Regulation – Construct all bulk storage tank installations (except mobile refuelers and other non-transportation related tank truck(s) so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation.  SPCC Plan – The drums and totes are commonly located on fabricated steel spill pallets when positioned outside or on plastic spill pallets when positioned inside. | August 2017 | Golder |
| Learjet - Hartford | and Bombardier SPCC Plan, March 13, 2015, Section 5.2.3 According to site personnel interviewed, the capture tank at the fuel farm has been pumped out around three times. No records were available to document the drainage events. | 40 CFR 112.8(c)(3) |  | 2017 | Golder |
| Learjet – Dallas | The site’s SPCC Plan states that tank overfill alarms will be tested periodically and tanks will be subject to periodic integrity testing. No records were available to demonstrate that either type of testing had been completed. In addition, no specific periodic schedule for the testing was documented. | 40 CFR 112.8(c)(6)  Bombardier SPCC Plan, April 23, 2019, Table 2-10 | Regulation – Test or inspect each aboveground container for integrity on a regular schedule and whenever you make material repairs. You must determine, in accordance with industry standards, the appropriate qualifications for personnel performing tests and inspections, the frequency and type of testing and inspections, which take into account container size, configuration, and design.  SPCC Plan – Each above ground bulk container is tested or inspected for integrity on a regular schedule and whenever material repairs are made. Each of the four diesel tanks is equipped with an overfill alarm. This alarm is tested periodically to ensure proper operation. |  |  |
| Cascade Engineering, Grand Rapids, MI | The Noble facility has two 10,000-gallon hydraulic oil tanks but has not completed integrity testing and inspections on the tanks. | 40 CFR 112.8(c)(6) | Follow the current industry standards which are drafted by the Steel Tank Institute, the Inspection of Aboveground Storage Tanks, STI SP001 standard. Examples of these integrity tests include, but are not limited to: visual inspection, hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or other systems of non-destructive testing. | 6-24-22 | Curtis |
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| **Storm Water - Chapter I Subchapter D – Water Programs (40 CFR 122) National Pollutant Discharge Elimination System** | | | | | |
|  |  |  |  |  |  |
| Ultra Clean Midwest | The facility operates under North American Industry Classification System (NAICS) code 332813 which correlates to Standard Industrial Classification (SIC) 3471. SIC code 3471 is considered light manufacturing and discharge of industrial storm water is regulated. The facility does not maintain a permit or storm water pollution prevention plan (SWPPP). Current exposures on the property include storage of obsolete equipment (See Photo 1), propane cylinders (See Photo 2), transfer of industrial wastewater outside (See Photo 3) and transfer of other materials and products during loading/unloading activities. | 40 CFR 122.21  40 CFR 122.26  10 CSR 20-6.200 | Due to current exposures, the facility needs to obtain a storm water permit through Missouri DNR by submitting Form E - Application for General Permit Under Missouri Clean Water Law and develop a storm water pollution prevention plan (SWPPP).  The other option is to eliminate all sources of storm water exposure and submit a No Exposure Certification (NEC) to Missouri DNR. | 12-8-21 | Curtis |
| Learjet – Wichita | SWPPP training and SPCC plan training are delivered together. Based on completion reports from the site's training tracking system, completion rates for SPCC / SWPPP training in 2017 and 2018 were 80% and 83% respectively. | Kansas Storm Water General Permit S-ISWA-1611-1,  Section 2.4.3.e  Bombardier SWPPP,  June 21, 2018, Section 4.2.6  40 CFR 112.7(f)  Bombardier SPCC Plan,  June 21, 2018, Section 4.5 | NPDES Permit  Employee training programs must be described in the SWPPP and include informing personnel responsible for implementing activities identified in the SWPPP or otherwise responsible for storm water management of the components and goals of the SWPPP.  SWPPP  Employees working in areas where industrial materials or activities are exposed to storm water will receive refresher training annually. Those responsible for housekeeping and/or preventive maintenance will also receive appropriate pollution prevention training on an annual basis.  SPCC Regulation  Train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan. Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility.  SPCC Plan  Learjet, Inc. personnel involved in the handling, management, and/or transport of petroleum materials are trained on the operation of the facility. Each employee is given training on spill prevention, maintenance of equipment, release requirements, and the contents of the Plan. An annual refresher is given to reinforce the Plan and highlight any changes that were made or problems that were encountered in the previous year. Spill prevention briefings are held during the annual refresher training and during routine safety and departmental meetings. | June 2019 | Golder |
| Learjet – Bridgeport, WV |  | 40 CFR 112.7(f) and SPCC plan 9/16/2015 Revision, Section 5.0  47 CSR 58-4.11 and 58-4.12.1.a and Groundwater Protection Plan, 2/26/2018 revision, Section 10 |  | April 2018 | Golder |
| USD 259 | Abundance of material (scrap metal, drums, tanks, abandoned equipment, etc.) are stored outside. No notice of intent (NOI) and/or Storm Water Pollution Prevention Plan (SWP3) were found on file (photos 35-38, 41-44). | State of Kansas General Permit No. S-ISWA-1611-1 | Determine the facility’s primary SIC code in order to conclude if site is applicable to Storm Water requirements. If SWP3 is required, a NOI would have to be submitted to KDHE. Quarterly and annual inspections would be required, as well as annual training for applicable employees. | Amanda | 7-30-18 |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Dallas | No records were available to demonstrate that the site had paid the annual water quality fee required by the storm water general permit. | Texas General Permit No. TXR050000, August 14, 2016, Part II, Section C.10.b | A facility authorized under this general permit and required to submit an NOI must pay an annual water quality fee of $200. | Sept 2019 | Golder |
| Learjet – Dallas | The storm water map for the site does not include all required elements. Specifically missing: Surface area, locations of receiving waters, location of non-storm water discharge, run-on from adjacent properties, locations of reportable spills | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section A.3.d | A site map must be developed that depict(s) the following………..  The site map must clearly show the flow of storm water runoff from each of these locations so that the final outfall(s) where the discharge leaves the facility’s boundary is apparent | Sept 2019 | Golder |
| Learjet – Dallas | The compressed air receiver outside was observed discharging blowdown that appeared to be contaminated with oil. Only uncontaminated condensate and blowdown are allowed. | Texas General Permit No. TXR050000, August 14, 2016, Part II, Section A.6.f | Industrial facilities that qualify for coverage under this general permit may discharge the following non-stormwater discharges through outfalls identified in the SWPPP, according to the requirements of this general permit:  -Uncontaminated air conditioner condensate, compressor condensate, and steam condensate, and condensate from the outside storage of refrigerated gases or liquids. | Sept 2019 | Golder |
| Learjet – Dallas | Non-stormwater discharge certifications are completed quarterly. However, based on the records of visual inspections, the non-stormwater discharge evaluations are being completed during rain events. Non-stormwater discharge evaluations must be done during dry weather to be able to identify non-stormwater flows. In addition, the certifications are being signed by an employee who does not meet the signatory requirements of the permit | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.1 |  | Sept 2019 | Golder |
| Learjet – Dallas | Quarterly site inspections are completed, but the weather conditions noted on the inspection records were “sunny” or “fair.” None were completed during a rain event. On inspection per year must be completed during a rain event. | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.2 | Qualified personnel, who are familiar with the industrial activities performed at the facility, shall conduct periodic routine facility inspections to determine effectiveness of the Pollution Prevention Measures and Controls.  Inspections must be conducted at least once per quarter unless otherwise specified in Part V of this permit. If feasible, at least one of these routine facility inspections each calendar year must be conducted during a period when a storm water discharge is occuring. | Sept 2019 | Golder |
| Learjet – Dallas | No records of an annual storm water comprehensive site compliance inspection were available for 2018. | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.5 | The comprehesive site compliance inspection must be conducted at least once each permit year by one or more qualified employees or designated resprentatives, including at least one member of the storm water pollution prevention team. | Sept 2019 | Golder |
| CK Technologies – Brownsville, Texas | The SWP3 does not include a list of non-stormwater discharges at the facility, as well as the results of a non-stormwater discharge evaluation. A certification must be provided as a result of the survey of non-stormwater sources. | Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.1 | The facility must complete a survey of non-stormwater discharges during dry weather conditions, include a list of non-stormwater discharges into the SWP3, and provide certification by the proper signatory authority of the facility. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The annual comprehensive site compliance inspection form is available by reference in the SWP3. | Recommendation  Texas General Permit No. TXR050000, August 14, 2016, Part III, Section B.5 | While the form is available, it would be best practice to place the form itself within the SWP3 for easy reference and access. | 3-2-21 | Curtis |
| CK Technologies – Brownsville, Texas | The SWP3 does not mention the Sector Y specific requirement for reviewing the use of zinc at the facility and possible pathways where zinc could contaminate stormwater runoff. | Texas General Permit No. TXR050000, August 14, 2016, Part V, Sector Y.2.a | Update the SWP3 to include a review of the use of zinc at the facility. If zinc is not used, the SWP3 should still mention this information. | 3-2-21 | Curtis |
| Global Parts | According to the 2020 OSHA logs, the facility operates under three different North American Industry Classification System (NAICS) codes. Building 907 operates under NAICS 336413, which correlates to Standard Industrial Classification (SIC) 3728. SIC code 3728 is considered light manufacturing and discharge of industrial storm water is regulated. The facility does not maintain a permit or storm water pollution prevention plan (SWPPP). Current exposures on the property include storage of scrap metal, tires, chemicals, and obsolete equipment. | 40 CFR 122.21  40 CFR 122.26  State of Kansas General Permit No. S-ISWA-1611-1 | Due to current exposures, the facility needs to obtain a storm water permit through KDHE by submitting a Notice of Intent (NOI) and develop a storm water pollution prevent plan (SWPPP).  The other option is to eliminate all sources of storm water exposure and submit a No Exposure Certification Form (NOEC) to KDHE. | 8-19-21 | Curtis |
| Pet-Ag | The facility operates under Standard Industrial Classification (SIC) 2047. SIC code 2047 is considered light manufacturing and discharge of industrial storm water is regulated. The facility obtained a No Exposure Certification from ILEPA for exclusion from NPDES storm water permitting on 4-2-21. There are current storm water exposures including a pallet of product stored temporarily outside, a pallet of salt left with tarp off (See Photo 1), and hydraulic equipment from the trash compactor leaving oily residue on the ground (See Photo 2). | 40 CFR 122.21  40 CFR 122.26  State of Illinois General NPDES Permit No. ILR00 | To maintain the current No Exposure Certification, move all exposed product and salt storage indoors or provide weatherproof cover to all items. The oily residue must be cleaned up and the hydraulic equipment needs weatherproof cover to prevent exposure to prevent introduction of a pollutant (i.e. oil) to storm water.  The other option is to obtain a storm water permit through ILEPA by submitting a Notice of Intent (NOI) and develop a storm water pollution prevent plan (SWPPP). | 9-14-21 | Curtis |
| Hillsboro | Wash water with cleaning chemicals is being discharged outside of the Washbay area resulting in unauthorized stormwater discharges (See Photos 1, 2, 3 and 4). The Kansas Stormwater General Permit does not authorize wastewater discharge to waters of the State of Kansas. | Kansas Stormwater General Permit S-ISWA-2111-1, Section 1.4 | The interior of the Washbay should be designed to prevent wastewater from draining outside the building. The floor surface should be designed to drain toward a collection point, the perimeter of the building should be sealed, or a small berm should be placed at the door entrance to prevent stormwater discharge. | 8-30-22 | Curtis |
| Max | The current contact information and composition of the Pollution Prevention Team still lists Suzie McMillian who is no longer with MAX. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.1 | Update the Stormwater Pollution Prevention Plan (SWPPP) to reflect the current staff members and team responsibilities. | 11-24-21 | Curtis |
| Max | There are 7 totes of sodium hydroxide solution which are used in the wastewater pre-treatment process that are stored outside (See Photo 11). These totes are not mentioned in the SWPPP. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.2(e) | If possible, move storage of these chemicals indoors to avoid risk of chemical spill due to mishandling or overall container degradation due to ultraviolet light from sunlight breaking down the plastic integrity of totes. If unable to move indoors, update SWPPP to reflect potential pollutant source. | 11-24-21 | Curtis |
| Max | The current SWPPP states that storm water inspections are taking place weekly during the hazardous waste inspections. No documentation or evidence was present at the time of the audit that shows inspections related to storm water management are taking place. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.3(d) | Begin completing at least quarterly inspections to inspect equipment and storage areas for raw material, finished product chemicals, recycling, equipment, paint, maintenance, loading, unloading, and waste management areas. An inspection report is required that includes completion dates for correction of all deficiencies. | 11-24-21 | Curtis |
| BG Products | The current Stormwater Pollution Prevention Plans (SWPPP’s) do not have a certification completed for the evaluation of outfalls for non-stormwater discharges as stated in Appendix G of the plans. | Kansas Stormwater General Permit S-ISWA-2111-1, Section 2.4.3(g) | Complete a study of all outfalls during dry weather conditions to verify no non-stormwater discharges are occurring. Once this is complete, sign the certification statements provided in Appendix G of the SWPPP’s. | 9-30-22 | Curtis |
| Max | The current SWPPP says that employees are trained on storm water management during Emergency and HazCom training. At the time of the audit there was no evident this was taking place. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.3(e) | Ensure all personnel who have responsibilities for implementing activities identified in the SWPPP or otherwise responsible for storm water management are trained. iSi recommends annual training frequency. | 11-24-21 | Curtis |
| Perfekta | The current SWPPP says that employees are trained on stormwater management during initial orientation and annually thereafter. At the time of the audit there was no evidence this was taking place. | Kansas Stormwater General Permit S-ISWA-2111-1, Section 2.4.3(e) | Ensure all personnel who have responsibilities for implementing activities identified in the SWPPP or otherwise responsible for stormwater management are trained initially and on an annual frequency. | 7-27-22 | Curtis |
| Max | At the time of the audit, there was no evidence that annual comprehensive site compliance evaluations have been completed. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.4 | Complete a documented comprehensive site compliance evaluation annually. The evaluation needs to include review of visual inspections, personnel making review, date(s), major observations, actions taken, and resolution to non-compliances. | 11-24-21 | Curtis |
| Max | At the time of the audit, there was no evidence that a visual examination of storm water quality has taken place. | Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.4.5(a) | Complete a visual inspection of storm water quality at least annually of each outfall during a rain event. The inspection report must include the date and time, name of the person performing examination, nature of discharge, visual quality of the discharge, and probable sources of any observed contamination. | 11-24-21 | Curtis |
| BG Products | There was no evidence that annual visual examinations of stormwater quality have taken place. | Kansas Stormwater General Permit S-ISWA-2111-1, Section 2.4.5(a) | Complete a visual inspection of stormwater quality at least annually of each outfall during a rain event. The inspection report must include the date and time, name of the person performing examination, nature of discharge, visual quality of the discharge, and probable sources of any observed contamination. | 9-30-22 | Curtis |
| Max | The current written SWPPP was created internally by the facility and lacks several provisions required by KDHE. | Recommendation  Kansas Storm Water General Permit S-ISWA-2111-1, Section 2.3 | iSi recommends, and KDHE also highly encourages and recommends, that SWPPP’s are prepared by, or under the supervision of a Kansas licensed Professional Engineer (P.E.) or with the services of a qualified consultant. | 11-24-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | Several areas of trash and debris were identified on the North side of the facility (See Photo 2). | Ohio Storm Water General Permit OHR000006, Section 2.1.2.2 | Clean up all trash debris around the facility. Trash debris can be managed on an as-needed basis during routine inspections or on a routine clean-up schedule to ensure trash debris is not accumulating. | 12-16-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | The Storm Water Pollution Prevention Plan (SWPPP) does not identify all potential pollutant sources on the property including: (See Photo 3)   * Propane storage * Compressed gas cylinders   Scrap metal | Ohio Storm Water General Permit OHR000006, Section 5.1.3.2 | Update the SWPPP to include all current pollutant sources associated with each identified industrial activity. | 12-16-21 | Curtis |
| Cascade Engineering – Grand Rapids, MI | Significant raw material debris was evident along the East silos due to maintenance work and spillage (See Photo 1). | Michigan Stormwater General Permit MIS110000, Part I.B.4 | Clean up all material debris around the facility immediately following spills and maintenance work to prevent stormwater contamination. | 6-24-22 | Curtis |
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| **Resource Conservation and Recovery Act (RCRA) – Chapter I Subchapter I – Solid Waste (40 CFR 239-279)** | | | | | |
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| Vermillion | Used solvent wipes were observed in the bottom of a flammable cabinet, at work stations, and in the trash (photos 2 – 4). | 40 CFR 260.10  40 CFR Part 261.4  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | All excluded wipes must be containerized when not in use. Containers must be kept closed and clearly labeled with the words “Excluded Solvent Contaminated Wipes.” Approval must be obtained from the landfill prior to shipping wipes under the exclusion (see Appendix A). | Amanda | 7-23-18 |
| Vermillion | Contaminated debris (cups, rags, paint brushes, etc.) are sitting on table top drying (photo 9-11). | 40 CFR 260.10 | A waste determination from 2016 for “solid hazardous waste” (see Appendix B) shows this material to be a hazardous waste, and should therefore be kept in a closed container and labeled as “Hazardous Waste”. | Amanda | 7-23-18 |
| USD259 | Used solvent contaminated wipes were observed hanging out of drum (photo 1). | 261.4(a)(26),(b)(18)  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | All excluded wipes must be completely containerized when not in use. | Amanda | 7-30-18 |
| Hillsboro | One drum of Excluded Solvent Contaminated Wipes is labeled as both “Hazardous Waste” and “Excluded Solvent Contaminated Wipes.” (Photo 9) | 40 CFR 261.4(a)(26)  40 CFR 261.4(b)(18)  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | All excluded wipes containers must be clearly marked with the words “Excluded Solvent Contaminated Wipes.” | Bria | 7-10-19 |
| USD 259 | A drum of solvent wipes was comingled with contaminated debris (tubes of adhesive, paint brushes, etc.) (photos 8-9). | 261.4(a)(26),(b)(18)  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | Excluded solvent contaminated wipes must be containerized separately from other waste streams. A waste determination should be completed for contaminated debris and then labeled and disposed of accordingly. | Amanda | 7-30-18 |
| USD 259 | Site is disposing of solvent wipes under the EPA exclusion to the landfill, but no approval from landfill was found on file. | 261.4(a)(26),(b)(18)  KDHE Technical Guidance Document – Solvent-Contaminated Wipes (HW-1995-G2) | Site must receive approval from landfill prior to disposing of wipes. Documentation showing that the wipes are removed from the site within 180 days from date of generation must be kept on file. | Amanda | 7-30-18 |
| BG Products | Wipes contaminated with IPA and other alcohol based solvents are being disposed of in regular trash. Need to be managed as hazardous waste or excluded solvent contaminated wipes. | 40 CFR 261.4(a)(26)  40 CFR 261.4(b)(18)  KDHE Technical Guidance Document HW-1995-G2 |  | 7-27-21 | Curtis |
| Pet-Ag | Alpet D2 sanitizing wipes (See Photo 3) and MEK wipes (See Photo 4) are being used in the facility and thrown in the trash. Alpet D2 wipes have a flashpoint of 70°F and MEK has a flashpoint of 20°F. Both wipes are flammable solids. | 40 CFR 261.4(a)(26)  40 CFR 261.4(b)(18) | Begin managing discarded wipes as hazardous waste or manage under the excluded solvent contaminated wipes rule. See Appendix C. | 9-14-21 | Curtis |
| GKN | The facility is using acetone and methyl ethyl ketone (MEK) on rags but is not managing as hazardous waste or excluded solvent contaminated wipes. To be excluded from hazardous waste regulations, the rags must be managed according to the exclusion rule. | 40 CFR 261.4(a)(26)  40 CFR 261.4(b)(18)  KDHE Technical Guidance Document HW-1995-G2 | Begin segregating solvent contaminated rags from oily rags. Recommend using different colored rags for easier management. Follow KDHE’s guidance document HW-1995-G2 for proper management. See Appendix D. | 9-13-22 | Curtis |
| USD 259 | Cardboard and cotton wipes contaminated with ink were observed in the trash (photo 19-20). | 40 CFR 262.11  K.A.R. 28-31-4(f)(1)(c) | Complete a waste determination in order to determine if material can be disposed of in regular trash. | Amanda | 7-30-18 |
| USD 259 | No waste determination was on-file for sand blasting machine (photo 31). | 40 CFR 262.11  K.A.R. 28-31-4(f)(1)(c)  KDHE Technical Guidance Document – Hazardous Waste Determinations (HW-2011-G1) | Complete a waste determination in order to determine if material can be disposed of in regular trash. | Amanda | 7-30-18 |
| Vermillion | No waste determination was on file for oily rags, which were observed on table tops and in trash in maintenance (photos 5-6). | 40 CFR 262.11 | Oily rags that contain no free-flowing liquids may be disposed of in regular trash. Create waste determination to reflect this. | Amanda | 7-23-18 |
| Vermillion | The waste code D009 is listed on several manifests, but is not present on the notification of regulated waste. D008 is present on waste determinations, but not present on any manifests. | 40 CFR 262.11  K.A.R. 28-31-261  K.A.R. 28-31-4 | Evaluate current waste streams for correct waste codes. Ensure that waste determinations match profiles and manifests. Update Notification of Regulated Waste Activity form to reflect any changes. | Amanda | 7-23-18 |
| Hillsboro | Waste determination missing for the following wastes, “Sandpaper,” “Glue/Adhesives”, “Aerosol Cans,” “Oil Filters,” “PCB/Non-PCB Ballasts,” etc. | 40 CFR 262.11  K.A.R. 28-31-262(c)(2)  Kansas Department of Health and Environment (KDHE) Technical Guidance Document – Hazardous Waste Determinations (HW-2011-G1) | Ensure all waste, hazardous and non-hazardous, has a waste determination.  It is recommended that a full evaluation on the waste being generated at the facility be conducted and all waste determinations be reviewed. | Bria | 7-10-19 |
| Hillsboro | Several partially full aerosol cans and paint cans were observed throughout the facility. (Photos 5, 12, 17, 20, 21, 22, 23) | 40 CFR 262.11  K.A.R. 28-31-262(c)(2)  KDHE Technical Guidance Document – Hazardous Waste Determinations (HW-2011-G1) | Complete a waste determination in order to determine if:  1) The material is waste.  2) If the material is waste, can it be disposed of in the regular trash or is it considered hazardous waste.  In the event that these aerosol cans cannot be fully emptied, “Resource Conservation and Recovery Act (RCRA) Empty,” and it is determined that they contain hazardous waste, it is recommended that a plan be developed for the disposal of partially full aerosol cans containing hazardous waste (i.e. set up a hazardous waste satellite container for partially full aerosol cans, install a puncturing device on a hazardous waste satellite container).  Throwing away partially full aerosol cans could be considered unlawful disposal of hazardous waste. | Bria | 7-10-19 |
| Atlas | The waste determination for grinding discs/pads does not encompass all discs/pads used at the facility. | 40 CFR 262.11 | Re-review, and potentially re-sample, the grinding discs/pads used throughout the facility and update waste determination to reflect all buildings. | Bria | 5-9-18 |
| Learjet – Hartford | Solder sponges are used in the Avionics Shop with lead-based solder. Based on employee interviews, the sponges may be discarded in the trash when they are no longer usable. The sponges could be hazardous waste due to the lead used. No records of waste characterization for the solder sponges were available | 40 CFR 262.11 and RCSA 22a-449(c)-102(a)(1) and (a)(2)(A) |  | 2017 | Golder |
| Cascade Engineering – Grand Rapids, MI Part 1 | Waste determinations are only completed for wastes that are picked up from the vendor, Heritage Crystal-Clean. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  R 299.9302 | Complete a full waste survey of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. | 2-18-21 | Curtis |
| CK Technologies – Brownsville, Texas | Waste determinations are only completed for wastes that are picked up from the vendor, ChemSol. Current wastes picked up include only hazardous and universal wastes. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  30 TAC 335.504 | Complete a full waste survey of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. (See Appendix D). | 3-2-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | Waste determinations are not completed for all waste streams at the facility. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  15A NCAC 13A.0107(a) | Complete a full waste inventory of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. | 4-14-21 | Curtis |
| Hillsboro Industries | The waste paint waste determination will need to be updated to account for the D035 waste code as MEK is utilized in the painting process. | 40 CFR 262.11  KDHE Technical Guidance Document – Hazardous Waste Determinations and Documentation (HW-2011-G1) | MEK is being utilized in the paint area and is ending up in the hazardous waste. D035 needs to be added to the waste paint profile.  Waste determinations to be maintained for 3-years. | 6-17-21 | Curtis |
| Global Parts | The facility is currently generating a small amount of hazardous waste from the spray painting process and thus the facility is a hazardous waste generator. Documented waste determinations are not completed on all waste streams for the facility.  All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  K.A.R. 28-31-262  KDHE Technical Guidance Document – Hazardous Waste Determinations (HW-2011-G1) | Complete a full waste survey of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. The only exemption is for regular office trash. See Appendix A. | 8-19-21 | Curtis |
| Ultra Clean Midwest | Waste determinations are not completed for all waste streams at the facility. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  10 CSR 25-5.262(1) | Complete a full waste inventory of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. | 12-8-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | While some hazardous waste determinations are documented through waste profiles or ISO documentation, waste determinations are not completed for all waste streams at the facility. All hazardous waste generators are required to determine if their wastes are a hazardous waste by either knowledge of the waste stream or by testing it, and maintaining records of that determination for at least 3 years. | 40 CFR 262.11  OAC 3745-52-11 | Complete a full waste inventory of all solid waste streams and complete a documented hazardous waste determination for each waste stream. This includes but is not limited to scrap metal, electronic wastes, batteries, liquid wastes hauled off site, rags, sludge, etc. | 12-16-21 | Curtis |
| BG Products | The waste determinations list using process knowledge as the methodology for making the determinations for many chemicals, but Safety Data Sheets (SDSs) are not saved with the determinations. | 40 CFR 262.11(c)(2) | KDHE requires all records used to make determinations (SDSs, process description/flow diagrams, etc.) to be attached or otherwise maintained onsite. KDHE does not allow use of a waste profile as the documented evaluation. | 9-30-22 | Curtis |
| BG Products | The facility is currently considering the discarded filters from the aerosol can puncturing station as non-hazardous waste. | 40 CFR 262.11(c)(2) | According to industry guidance, discarded filters should be assigned all of the hazardous waste codes that apply to the accumulated residual aerosol can liquids unless testing or knowledge can be used to demonstrate the waste does not exhibit the hazardous waste characteristic(s). | 9-30-22 | Curtis |
| Global Parts | The facility is generating hazardous waste in both normal process and inventory clean-up activities on a non-routine basis, however the facility is unsure of its generator category. | 40 CFR 262.13  K.A.R. 28-31-262  Guidance Document HW-2011-G2 | Document the amount of hazardous waste generated over the past 3 years and make a formal determination of what category the facility should be. It is based on generation per month and total storage at any one time of hazardous waste. Do not include wastewater discharge, used oil, or universal waste. For definition of hazardous waste see Appendix B. | 8-19-21 | Curtis |
| Cascade Engineering – Grand Rapids, MI | The aerosol can puncturing station has the air filter removed, thus leaving the hazardous waste container with an opening (See Photo 3). Although there is no formal requirement at the federal level or State of Michigan level to close hazardous waste containers at the VSQG generator level, it is recommended to do so. State of Michigan in their guidance states to close containers except when adding or removing waste. | Recommendation  40 CFR 262.14  R 299.9304  40 CFR 265 Subpart AA  EGLE Very Small Quantity Hazardous Waste Generators Guidance Revision 8/2021 | Reattach the air filter to the aerosol can puncturing station to close the hazardous waste container and ensure no hazardous air emissions are occurring. | 6-24-22 | Curtis |
| USD 259 | Waste is being brought to service center from USD 259 schools (photo 24). | 40 CFR 262.14(a)(5)(viii) and 40 CFR 262.17(f)  Bureau of Waste Management Policy 2017-P2 | Schools would be classified as a CESQG and could in turn, send their hazardous waste to a LQG (Service Center) that is under the control of the same person. The LQG must submit the Notification of Regulated Waste Activity form and addendum for LQG consolidation of CESQG to the KDHE Bureau of Waste Management. The LQG must also ensure that waste is labeled as “Hazardous Waste” and that determinations are created once the waste is brought to the service center. | Amanda | 7-30-18 |
| Cascade Engineering – Grand Rapids, MI | A plastic container with “waste acetone” was in the Quality Lab without proper labeling (See Photo 2). A waste determination was also not available. | 40 CFR 262.14(a)(5)(viii)(B)(1)  R 299.9304(1)(e)(xii)(A)  40 CFR 262.11  R 299.9302  EGLE Very Small Quantity Hazardous Waste Generators Guidance Revision 8/2021 | Label the container with the words “hazardous waste.” Also, document a waste determination for the waste stream. See Appendix C. | 6-24-22 | Curtis |
| Pefekta | Several cue tips were laying on the floor that were used with MEK. All hazardous waste materials must be placed in a closed container and labeled as hazardous waste as soon as the material is determined to be waste. | 40 CFR 262.16(b)(2)(iii) | Ensure all employees are placing hazardous waste immediately into closed and labeled hazardous waste containers. | 7-27-22 | Curtis |
| Cascade Engineering – Montpelier, Ohio | Weekly hazardous waste storage area and emergency equipment inspections are being completed frequently but are not being documented. Small Quantity Generators (SQG’s) must complete an inspection at least weekly of central accumulation areas looking for leaking containers and for deterioration of containers caused by corrosion or other factors as well as emergency equipment. | 40 CFR 262.16(b)(2)(iv)  OAC 3745-52-16(B)(2)(d)  OAC 3745-65-33 | Ensure that hazardous waste inspections are completed weekly for all storage areas and emergency equipment. Inspections must be recorded in an inspection log or summary. See Appendices C, D, and E. | 12-16-21 | Curtis |
| Perfekta | The weekly hazardous waste central accumulation area has not been inspected and documented since July 2021. Small Quantity Generators (SQG’s) must complete an inspection at least weekly of central accumulation areas of storage containers looking for leaking containers and for deterioration of containers caused by corrosion or other factors. | 40 CFR 262.16(b)(2)(iv) | Ensure that hazardous waste inspections are completed weekly for all storage areas. Inspections must be recorded in an inspection log or summary. | 7-27-22 | Curtis |
| Perfekta | A step can used for hazardous waste collection was marked with a label for “biohazard” waste but not “hazardous waste.” Small quantity generators must mark or label containers with the words “hazardous waste.” | 40 CFR 262.16(b)(6)(i)(A) | Remove biohazard label and place a hazardous waste label on container. | 7-27-22 | Curtis |
| Perfekta | Hazardous waste storage drums in the central accumulation area were not labeled with the accumulation start date. The date upon which each period of accumulation begins must be clearly visible for the inspection of each hazardous waste storage container. | 40 CFR 262.16(b)(6)(i)(C) | Ensure accumulation start dates are placed on all hazardous waste storage containers. | 7-27-22 | Curtis |
| CK Technologies – Mount Airy, North Carolina | The facility is listed as a small quantity generator (SQG) but does not maintain a preparedness and prevention plan and has not made arrangements with local police, fire, emergency response teams, emergency response contractors, equipment suppliers, local hospital, and Local Emergency Planning Committee who are necessary for response to emergencies to the facility. | 40 CFR 262.16(b)(8)  15A NCAC 13A.0107(a) | Create a preparedness and prevention plan that includes all the requirements including equipment needed to respond to emergencies, internal communication or alarm systems, telephone or two-way radio capable of summon emergency assistance, fire extinguishers or fire control equipment. The plan must be sent to local fire, police, medical, and emergency response authorities. Employees must be thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities. | Curtis | 4-14-21 |
| Hillsboro Industries | No spill kit or fire extinguisher is located at the storage area (see Photo 2). | 40 CFR 262.16(b)(8)(ii) | A spill kit and fire extinguisher should be located in close proximity to the storage area. There is a fire extinguisher in the south storage building that can be used but should have a sign on the outside of the building showing a fire extinguisher is located inside that can be easily seen from the storage area. | 6-17-21 | Curtis |
| Hillsboro | Emergency responders at the facility consist of Jason Elliot and Mike Gerken. | 40 CFR 262.16(b)(9)(iii) | Primary and secondary emergency responders shall have the appropriate response training.  It is recommended that emergency responders attend HAZWOPER training. | Bria | 7-10-19 |
| Hillsboro | Weekly hazardous waste storage area inspections for the weeks of October 28, 2018 – November 3, 2018 and March 3, 2019 – March 9, 2019 were not conducted.  The weekly hazardous waste storage area inspections for July 1, 2016 – June 22, 2018 were not readily available for review. | 40 CFR 262.16(b)(2)(iv) | Ensure that hazardous waste inspections are completed weekly for all storage areas. | Bria | 7-10-19 |
| CK Technologies – Mount Airy, North Carolina | The facility has a posting for emergency response, but does not meet all the requirements including the name of an emergency coordinator who is able to reach the site within a short time (30 minutes) or location of fire extinguishers, spill control material and alarms. | 40 CFR 262.16(b)(9)  15A NCAC 13A.0107(a) | Update the emergency response poster to include a primary and secondary emergency coordinator who are able to respond to emergencies within a 30-minute response time. The poster must be next to telephones or in areas directly involved in the generation and accumulation of hazardous waste. | 4-14-21 | Curtis |
| Hillsboro | Emergency contact information signage had fallen onto the ground next to the 90-day hazardous waste storage area. | 40 CFR 262.16(b)(9)(ii) | Hazardous waste storage areas must have emergency contact information clearly posted. | Bria | 7-10-19 |
| Facility | Failure to train employees on the SQG Preparedness and Prevention Plan | 40 CFR 262.16(b)(9)(iii)  K.A.R. 28-31-262(d) | Employees must be thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. | Bria | 7-30-18 |
| Cascade Engineering – Grand Rapids, MI Part 1 | The East Plant is registered as a Small Quantity Generator (SQG) but is not conducting weekly documented inspections of central accumulation areas. | 40 CFR 262.16(b)(2)(iv)  R 299.9306 | If maintaining classification as a SQG, ensure that hazardous waste inspections are completed on a weekly basis for all storage containers of hazardous waste. | 2-18-21 | Curtis |
| Cascade Engineering – Grand Rapids, MI Part 1 | Current employees are not trained on emergency procedures related to hazardous waste. Employees must be thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. | 40 CFR 262.16(b)(9)(iii)  R 299.9306 | As a SQG, employees must be thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. | 2-18-21 | Curtis |
| Facility | No job descriptions were found for employees handling hazardous waste. | KAR 28-31-262; 40 CFR 262.17(a)(7)  40 CFR 265.16(d) | Training documentation related to hazardous waste that the owner or operator must maintain at the facility must include the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job. | Amanda | 7-30-18 |
| Hillsboro | Ensure all waste codes are accounted for with KDHE. | K.A.R. 28-31-4  40 CFR 262.18  KDHE Notification of Regulated Waste Activity Form (Form 8700-12 and 8700-23) | Ensure that all waste codes are present on your annual hazardous waste report. Should a waste code not be present, or an extra waste code be present on the annual hazardous waste report it is recommended that a Notification of Regulated Waste Activity Form be updated and submitted to KDHE. | Bria | 7-10-19 |
| Global Parts | The facility generates hazardous waste in quantities exceeding amounts needed to be registered with an EPA identification number.    In Kansas, Conditionally Exempt Small Quantity Generators (CESQG’s) do not need a registration number under normal circumstances. Since the facility generated more than 55 pounds of hazardous waste in the March 2021 shipment, the facility should either had to (1) obtain authorization to do an episodic event or (2) register as a short-term generator as a large quantity generator (LGQ). Both circumstances required registration with EPA. | 40 CFR 262.18  K.A.R. 28-31-262  40 CFR 262.232 | After determining the facility’s generator category, obtain an EPA identification number through KDHE to allow generating of hazardous waste in excess of 55 pounds per month using KDHE’s form of Notification of Regulated Waste Activity. See Appendix C. | 8-19-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | The facility is currently registered as a SQG but last notification of regulated waste activity was in 2006. New EPA regulations require SQG’s to re-notify about their generator status every 4 years beginning 9-1-2021. | 40 CFR 262.18  OAC 3745-52-18 | Update and submit a new RCRA Subtitle C Site Identification form to the Ohio EPA. See Appendix F. Another option is to follow item # 4. | 12-16-21 | Curtis |
| Learjet – Wichita | Records of hazardous waste accumulation area inspections were not available for the following periods:  - Week of June 4, 2018  - Week of May 21, 2018  - Between July 5 and October 2, 2018 | KAR 28-31-262(a) and 28-31-265(a) (incorporates Federal rules [40 CFR 262 and 265] in effect on July 1, 2006)  40 CFR 262.34(a)(1)(i) and 265.174 (July 1, 2006 version) | At least weekly, the owner or operator must inspect areas where containers are stored. The owner or operator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. | June 2019 | Golder |
| Learjet – Hartford | One lab pack drum in the Hazardous Waste Accumulation Building was not marked with a hazardous waste label | 40 CFR 262.34(a)(3) and RCSA 22a-449(c)-102(a)(2)(J) |  | 2017 | Golder |
| Learjet – Tucson, AZ | No records that employees received detailed, formal hazardous waste training.  Records were not available to verify employee training on universal waste. | 40 CFR 262.34(a) and  40 CFR 265.16  AAC R18-8-262.A  AAC R18-8-265.A (incorporate federal regulation by reference)  7.09 Pima County Code (incorporates State and Federal regulations by reference)  40 CFR 273.16  AAC R18-8-273 (incorporates Federal regulation by reference) | Employees involved with hazardous waste management must be trained on hazardous waste management procedures and response to emergencies. The training must be completed within 6 months of employment or assignment to hazardous waste responsibilities provided the employee is directly supervised during that 6 month period. A review of the training must be completed annually.  A small quantity handler of universal waste must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility. | August 2017 | Golder |
| GKN | A hazardous waste container of MEK in the centralized accumulation area is not marked with the accumulation start date (See Photo 2). | 40 CFR 262.34(a)(2) | Mark the container with the date the container become a hazardous waste storage container with MEK. Ensure weekly inspections are checking for proper labeling requirements. | 9-13-22 | Curtis |
| Vermillion | Paint waste from the Paint Mixing Area is being brought to and disposed of in a satellite drum in the Maintenance Shop (photo 7). | 40 CFR 262.34(c)  K.A.R. 28-31-262(c)(6) | Satellites must be stored at or near the point of generation where the waste initially accumulates. | 7-23-18 | Amanda S |
| Max | There is a 55-gallon drum of liquid paint waste that is not labeled with the words “hazardous waste” (See Photo 1). | 40 CFR 262.34(c)(1)(ii)  K.A.R. 28-31-262(c)(7) | Replace or cover up old chemical label and place a hazardous waste label onto the container. | 11-24-21 | Curtis |
| Learjet – Wichita | Two bags marked as hazardous waste were observed open in satellite accumulation areas. Waste was not being actively added or removed from the containers (Photographs 33 and 34). | KAR 28-31-262(a) and  28-31-265(a) (incorporates Federal rules [40 CFR 262 and 265] in effect on July 1, 2006)  40 CFR 262.34(c)(1) and 265.173(a) (July 1, 2006 version) | Hazardous waste must be accumulated in containers and those containers must be closed except when it is necessary to add or remove waste. | June 2019 | Golder |
| Learjet – Wichita | Based on completion reports from the site's training tracking system, the completion rate for hazardous waste / universal waste training in 2018 was 36%. There were no records of training for 2017. |  | KAR 28-31-262(a) and 28-31-265(a) (incorporates Federal rules [40 CFR 262 and 265] in effect on July 1, 2006)  40 CFR 262.34(a)(4) and 265.16 (July 1, 2006 version)  K.A.R 28-31-273(a) (incorporates Federal rule [40 CFR 273] by reference)  40 CFR 273.16 | June 2019 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Tucson, AZ | A container used to accumulate hazardous waste filter cake did not have a cover. The filter press was not running and the container was not being actively filled at the time of the observation. | 40 CFR 262.34(c)(1) and  40 CFR 265.173(a)  AAC R18-8-262.A and  AAC R18-8-265.A (incorporates Federal regulations by reference)  7.09, Pima County Code (incorporate Federal regulations by reference) | A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. | August 2017 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| USD 259 | Several drums of hazardous waste crushed lamps were observed outside of building with no date on drums (photos 38-39). | 40 CFR 265.34  K.A.R. 28-31-4(g)(h)(j)(m) | Ensure that all storage drums of hazardous waste are dated and disposed of within 90 days. | Amanda | 7-30-18 |
| USD 259 | Label not visible on drum of waste (photo 7). | 262.34(a)(2-3); (d)(4) | Ensure that labels are legible and visible on all containers of hazardous waste. | Amanda | 7-30-18 |
| Learjet – Bridgeport, WV |  |  | A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. | April 2018 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Max | There are 2 drums that are pending analysis dated 2-2-21 (See Photo 2). If these drums turn out to be hazardous waste, they will exceed the 180-day storage requirement. | 40 CFR 262.34(d)  K.A.R. 28-31-262a – Adopted by reference  RO 11424 (4-21-1989) | Ensure hazardous waste determination is completed in a timely fashion. If lab sample is lost, re-sample as soon as possible and make waste determination. | 11-24-21 | Curtis |
| Max | Employee is completing the weekly hazardous waste inspections but has not had training on hazardous waste management. | 40 CFR 262.34(d)(5)(iii)  K.A.R. 28-31-262a(d)(1)(A) | Ensure all employees who are completing hazardous waste inspections are fully trained on all applicable requirements on hazardous waste management. | 11-24-21 | Curtis |
| USD 259 | Failure to train employees on Hazardous Waste Contingency Plan | 40 CFR 262.34(d)(5)(iii)  40 CFR 265.16(a)(2)  40 CFR 265.16(d)(3) | Employees that handle waste should be trained on the contents of the Hazardous Waste Contingency Plan upon hire and then annually thereafter. | Amanda | 7-30-18 |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| USD 259 | A drum of paint waste was observed with a date of 4-4-18 (photo 21). | 40 CFR 262.34(e) | As a Large Quantity Generator of hazardous waste, waste can only be stored on-site for 90 days or less. | Amanda | 7-30-18 |
| USD 259 | No emergency contact information or hazardous waste signage is posted at the hazardous waste storage area (photo 26). | 40 CFR 262.52(d)-(e)  40 CFR 265.54(d)  K.A.R 28-31-4(h)(9) | Any hazardous waste storage area must have emergency contact information posted as well as signage that designates the area as a “Hazardous Waste Storage Area”. | Amanda | 7-30-18 |
| Hillsboro | Hazardous waste left unattended on a tabletop in the paint department. (Photo 7) | 40 CFR 264.173 | Hazardous waste must be disposed of to a container that is able to be properly closed and labeled “Hazardous Waste.” | Bria | 7-10-19 |
| USD 259 | No weekly hazardous waste inspection was observed for the week of 5-28-18. | 40 CFR 264.174 | All hazardous waste storage areas must be inspected weekly and documentation must be maintained on file for a minimum of 3 years. | Amanda | 7-23-18 |
| USD 259 | A weekly inspection from 3-5-18 was missing the date and time of inspection. | 40 CFR 265.15(d) | At a minimum, weekly inspections should be documented in a log and should include the date and time of the inspection, the name of the inspector, a notation of the observations made, and the date and nature of any repairs or other remedial actions. | Amanda | 7-30-18 |
| Atlas | All weekly hazardous waste inspection logs are missing the time. | 40 CFR 265.15(d) | N/A | Bria | 5-9-18 |
| Atlas | There are no records on file for Tim Parks for RCRA or Contingency Plan training in 2017. Also, annual training records for 2018 could not be located at the time of the audit. | 40 CFR 265.16(c) | RCRA and Contingency Plan training is required annually for personnel responsible for hazardous waste handling. Ensure training is conducted and documented for both requirements. | Bria | 5-9-18 |
| Atlas | Job descriptions were outdated. | 40 CFR 265.16(d) | N/A | Bria | 5-9-18 |
| USD 259 | Even though the facility is a non-smoking site, several cigarettes were observed on the ground as well as were cigarette receptacles. Non-smoking signs were not posted at Hazardous Waste storage areas. | 40 CFR 265.31 | Ensure that “No-Smoking” signs are posted at the Hazardous Waste storage areas. | Amanda | 7-30-18 |
| GKN | A telephone or hand-held two-way radio capable of summoning emergency assistance is not immediately available to contact external emergency assistance by hazardous waste accumulation areas. The West building has a phone in an adjacent room in a cubicle and the East building has a phone in excess of 75 feet away at a workstation. | 40 CFR 265.32(b) | Install phones or other communication devices within the immediate area of both hazardous waste central accumulation areas that are capable of contacting external emergency response teams. Another option is to program all phone numbers into management personnel’s cell phones including emergency coordinators and fire department. | 9-13-22 | Curtis |
| USD 259 | Drums of spent batteries that were stored outside were not dated (photos 43-44). | 40 CFR 265.34  K.A.R. 28-31-4(g)(h)(j)(m) | Ensure that all containers of universal waste are maintained in good condition and dated when accumulation begins. | Amanda | 7-30-18 |
| USD 259 | Inadequate aisle space was observed in the Building A HW Storage Area (photo 22). | 40 CFR 265.35 | Ensure there is sufficient access to hazardous waste containers at all times. This should be an item noted during weekly inspections. | Amanda | 7-30-18 |
| Atlas | Inadequate aisle space was observed in the Building A HW Storage Area (photo 18). | 40 CFR 265.35 | Ensure there is sufficient access to hazardous waste containers at all times. This should be an item noted during weekly inspections. | Bria | 5-9-18 |
| Hillsboro Industries | The SQG Preparedness and Prevention Plan will need to be updated to account for the addition of D035 to the waste paint. | 40 CFR 265.37(a)(1) | Familiarize the local emergency authorities with the facility layout, properties and hazards of each waste handled. | 6-17-21 | Curtis |
| GKN | The facility is registered as a SQG but has not made attempts to make the following arrangements:   * Familiarize the local emergency authorities with the facility layout, properties and hazards of each waste handled, location of workers, entrances to facility roads, and possible evacuation routes. * Designate one authority where more than one police or fire department might respond to an emergency. * Made arrangements with state emergency response teams, emergency response contractors, and equipment suppliers.   Familiarize local hospitals with the properties of hazardous waste handled and types of injuries or illnesses which could result from fires, explosions, or releases at the facility. | 40 CFR 265.37(a) | Develop an SQG Preparedness and Prevention Plan and send copies to the local police and fire departments, responding medical facility, and Sumner County Emergency Management Coordinator. Use and keep certified mail receipts if sending by mail. If sending by e-mail confirm receipt and keep confirmation e-mail on file. | 9-13-22 | Curtis |
| Learjet – Hartford, CT | The emergency contacts posted at the Hazardous Waste Accumulation Building were not up-to-date and include contact information for people no longer with the company. The number for the emergency coordinator was not readable. In addition, the emergency contact information in the Emergency Response and Contingency Plan (dated May 2012) also included out-of-date emergency contact information | 40 CFR 265.52(d) and RCSA 22a-449(c)-105(a)(1) (incorporates Federal rule by reference) |  | 2017 | Golder |
| Learjet – Wichita | No records were available to demonstrate that the site’s hazardous waste contingency plan had been submitted to the local response authorities | 40 CFR 265.53 | A copy of the contingency plan and all revisions to the plan must be submitted to all local police departments, fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency services | 2016 | Golder |
| Learjet – Hartford, CT | Records were not available to demonstrate that the Emergency Response and Contingency Plan had been submitted to responding agencies. | 40 CFR 265.53 and RCSA 22a-449(c)-105(a)(1) (incorporates Federal rule by reference) |  | 2017 | Golder |
| USD 259 | No documentation was on file showing that the Hazardous Waste Contingency Plan had been submitted to local agencies. | 40 CFR 265.53(b) | Copies of the plan and any revisions must be provided to the police and fire department, hospitals, local emergency planning committee, and any emergency response agencies that may respond to an emergency. iSi recommends the use of Certified Mail when submitting documents to State and Federal agencies. | Amanda | 7-30-18 |
| Hillsboro Industries | A 55-gallon drum of hazardous waste flammable solids had lid on top, but not fully closed. Since it is not liquid, it does not have to be sealed liquid tight. For solids the lid must be in contact with the container with no gaps (see Photo 3). | 40 CFR 265.173(a)  KDHE Technical Guidance Document – Container Management for Hazardous Waste Generators (HW-2005-G1) | Ensure all hazardous waste containers are fully closed with no gaps. | 6-17-21 | Curtis |
| Hillsboro Industries | The 55-gallon drum of hazardous waste in the south spray booth had a missing lid (see Photo 4). | 40 CFR 265.173(a)  KDHE Technical Guidance Document – Container Management for Hazardous Waste Generators (HW-2005-G1) | Ensure all hazardous waste containers are kept closed at all times except for adding or removing waste. | 6-17-21 | Curtis |
| Max | There is a 55-gallon drum of hazardous waste in a satellite accumulation area with a lid that is not fully closed (See Photo 3). | 40 CFR 265.173(a)  K.A.R. 28-31-265 – Adopted by reference | Adjust lid position so the container is able to be fully closed or replace lid with new cover that is able to be shut so there are no visible air gaps between the lid and the container. | 11-24-21 | Curtis |
| USD 259 | Several weekly hazardous waste inspections were missing. | 40 CFR 265.174 | Ensure that hazardous waste inspections are completed weekly for all storage areas. | Amanda | 7-30-18 |
| Learjet – Dallas | Records of hazardous waste accumulation area inspections were not available for the following weeks…… | 40 CFR 265.174  30 TAC 335.69(f)(2) | At least weekly, the owner or operator must inspect areas where containers are stored. The owner or operator must look for leaking containers and for deterioration of containers caused by corrosion or other factors. | Sept 2019 | Golder |
| Max | Weekly hazardous waste inspections were not completed for the weeks ending 11-12 -21 or 11-19-21. | 40 CFR 265.174  K.A.R. 28-31-265(a) – Adopted by reference | Ensure weekly hazardous waste inspections are completed. If necessary, assign a back-up inspector who can complete the inspections when the primary inspector is busy or not present. | 11-24-21 | Curtis |
| Cascade Engineering – Grand Rapids, MI | Spent fluorescent bulbs were observed in open boxes and outside of boxes as well (See Photo 4). | 40 CFR 273.13(d)(1)  40 CFR 273.14(e)  40 CFR 273.15(c)  R 299.9228  EGLE Universal Waste Guidance Revision 5/2022 | Ensure all spent lamps are properly containerized, dated, closed, and marked with the words “Universal Waste – Lamps,” “Waste Lamps,” or “Used Lamps.” | 6-24-22 | Curtis |
| Learjet – Dallas |  | 40 CFR 273.14(a) and 273.15  TAC 335.261(b) |  | Sept 2019 | Golder |
| Learjet – Fort Lauderdale |  |  |  | October 2017 | Golder |
| Hillsboro | Rechargeable batteries, formerly used in power tools, which no longer hold a charge were observed on a tabletop. | K.A.R.28-31-273  40 CFR 273.2  KDHE Technical Guidance Document – Requirements for Handlers of Universal Waste (HW-2001-G1) | Ensure all spent batteries are properly containerized, dated, closed, and marked with the words, “Universal Waste – Batteries,”  SQGs may accumulate universal waste for no longer than one year from the date the universal waste is generated. | Bria | 7-10-19 |
| USD 259 | Un-containerized lamps, as well as an open box of lamps, were observed (photos 13 –14). | 40 CFR 273.13(d)(1)  40 CFR 273.14(e)  40 CFR 273.15(c)  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all spent lamps are properly containerized, dated, closed, and marked with the words “Universal Waste – Lamps,” “Waste Lamps,” or “Used Lamps.” | Amanda | 7-30-18 |
| Hillsboro | Open and unlabeled box of universal waste lamps. (Photo 1). | 40 CFR 273.13(d)(1)  40 CFR 273.14(e)  40 CFR 273.15(c)  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all spent lamps are properly containerized, dated, closed, and marked with the words “Universal Waste – Lamps,” “Waste Lamps,” or “Used Lamps.”  Small Quantity Generators (SQGs) may accumulate universal waste for no longer than one year from the date the universal waste is generated. | Bria | 7-10-19 |
| Vermillion | One 4-ft box of bulbs was observed as open (photo 8). | 40 CFR 273.14(e)  K.A.R. 28-31-273 | Ensure all spent fluorescent lamp containers are kept closed unless adding or removing lamps | Amanda | 7-23-18 |
| Hillsboro Industries | Spent fluorescent bulbs were observed in open containers in the compressor room and uncontainerized within the maintenance area. (see Photos 5, 6) | 40 CFR 273.13(d)(1)  40 CFR 273.14(e)  40 CFR 273.15(c)  K.A.R. 28-31-273  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all spent lamps are properly containerized, dated, closed, and marked with the words “Universal Waste – Lamps,” “Waste Lamps,” or “Used Lamps.”  SQGs may accumulate universal waste for no longer than one year from the date the universal waste is generated. | 6-17-21 | Curtis |
| Max | There is a box of 4-foot fluorescent lamps (See Photo 4) and a box of metal halides lamps that were not closed (See Photo 5). | 40 CFR 273.13(d)(1)  K.A.R. 28-31-273 – Adopted by reference  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all universal waste containers are properly containerized and closed. | 11-24-21 | Curtis |
| Max | There is a container of unlabeled waste fluorescent lamps (See Photo 6). | 40 CFR 273.14  K.A.R. 28-31-273 – Adopted by reference  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure all universal waste containers are properly marked with the words “Universal Waste – Lamps” or “Waste Lamps.” | 11-24-21 | Curtis |
| Max | There is a container of waste fluorescent lamps that has an accumulation start date of 4-5-19 (See Photo 7). Universal wastes are not allowed to be stored on-site for longer than 1 year. | 40 CFR 273.15(a)  K.A.R. 28-31-273 – Adopted by reference  KDHE Technical Guidance Document – Spent Fluorescent Lamps (HW-1995-G1) | Ensure universal waste is not stored for longer than 1-year. Best practices are to add inspections of universal waste to weekly hazardous waste inspection or move universal waste storage into same area as hazardous waste to ensure compliance. | 11-24-21 | Curtis |
| GKN | Containers of universal waste batteries are not able to demonstrate accumulation time is less than one year (See Photo 3). | 40 CFR 273.15 | A small quantity handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated by:  (1) Placing the universal waste in a container and marking or labeling the container;  (2) Marking or labeling each individual item of universal waste;  (3) Maintaining an inventory system on-site that identifies the date each universal waste became a waste;  (4) Maintaining an inventory system that identifies the earliest date that any universal waste in a group of containers became a waste;  (5) Placing the universal waste in a specific accumulation area and identifying the earliest date that any universal waste became a waste; or  (6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it becomes a waste or is received. | 9-13-22 | Curtis |
| Learjet – Dallas | The completion rate for hazardous waste / universal waste training in 2018 was approximately 65%. There were no records for training for 2017. | 40 CFR 273.16  30 TAC 335.261(b)  30 TAC 335.69(f)(5)(c) | The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies.  A small quantity handler for universal waste must inform all employees who handle or have responsibility for managing universal waste. The information must describe proper handling and emergency procedures appropriate to the type(s) of universal waste handled at the facility. | Sept 2019 | Golder |
| USD 259 | A drum of Used Oil was observed labeled as “Non-Hazardous Waste” (photo 17). | 40 CFR 279.22(c)  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Ensure all used oil containers are clearly marked with the words “Used Oil.” | Amanda | 7-30-18 |
| USD 259 | A drum of Used Oil was observed labeled as “Non-Hazardous Waste Cutting Oil” (photo 32). | 40 CFR 279.22(c)  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Ensure all used oil containers are clearly marked with the words “Used Oil.” | Amanda | 7-30-18 |
| Atlas | Unlabeled used oil containers were observed next to machines in Building D, as well as outside at Building 4330 (photos 19 – 23). | 40 CFR 279.22(c) | Ensure all used oil containers are clearly marked with the words “Used Oil.” | Bria | 5-9-18 |
| Learjet – Dallas | Used oil containers were not marked as “used oil” in the Facility Maintenance Shop and the leased hanger. | 40 CFR 279.22(c)(1)  30 TAC 324.6 | Containers and aboveground storage tanks used to store used oil at generator facilities must be labeled or marked clearly with the words “used oil” | Sept 2019 | Golder |
| Cascade Engineering – Grand Rapids, MI Part 1 | Labeling on used oil tanks in facility are labeled as “waste” oil. | 40 CFR 279.22(c)  R 299.9810 | Re-mark containers, tanks, and piping as “used oil.” The term “waste” implies the oil is potentially hazardous and does not follow the explicit regulations. | 2-18-21 | Curtis |
| Hillsboro Industries | Used oil container still has labeling from previous container use that contain different identification and hazard information (see Photo 7). | 40 CFR 279.22(c)  K.A.R. 28-31-279  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Remove or cover repurposed containers so there is not conflicting identification and hazard identification. | 6-17-21 | Curtis |
| Global Parts | A small container of used oil is not labeled (See Photo 2). | 40 CFR 279.22(c)  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Ensure all used oil containers are clearly marked with the words “Used Oil.” See Appendix D. | 8-19-21 | Curtis |
| Max | A small container of used oil from an oil skimmer is not labeled (See Photo 8). | 40 CFR 279.22(c)  K.A.R. 28-31-279 – Adopted by reference  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | Ensure all used oil containers are clearly marked with the words “Used Oil.” | 11-24-21 | Curtis |
| Hillsboro | Used oil is given to a local resident of Hillsboro who burns it. Receipts are not provided to prove that this used oil is removed from the property. | 40 CFR 279.24  KDHE Technical Guidance Document – Used Oil (HW-1999-G1) | A generator must use a used oil transporter who has registered with the KDHE. | Bria | 7-10-19 |
| GKN  (Kansas Reg) | The facility is completing the annual SQG hazardous waste site information verification, however during the audit the facility was not able to determine if the current notification of regulated waste activity to KDHE is up to date due to personnel change. | K.A.R. 28-31-4 | Submit an updated Notification of Regulated Waste Activity form to KDHE with new site contact information. Updates must be made within 60 days of change of site contact, new hazardous waste codes, or change in generator classification status. See Appendix C. | 9-13-22 | Curtis |
| GKN (Kansas Reg) | A 55-gallon aerosol can puncturing station (satellite container) is not marked with the words “hazardous waste” (See Photo 1). | K.A.R. 28-31-262(c)(7) | Mark the satellite container with the words “hazardous waste.” | 9-13-22 | Curtis |
| Learjet – Fort Lauderdale |  | 62-730-160(6) FAC |  | October 2017 | Golder |
| Learjet – Fort Lauderdale |  | 62-710.850(2) and (5)(a) FAC |  | October 2017 | Golder |
| Learjet – Dallas | Waste accumulated for a loose pack were identified as “flam” indicting they were ignitable hazardous wastes. They were not labeled as hazardous waste or with an accumulation start date. | 30 TAC 335.69(a)(2) and (3) | While being accumulated hazardous waste containers must be:  -Clearly marked with the date upon which each period of accumulation begins  -Labeled or marked clearly with the words “hazardous waste” | Sept 2019 | Golder |
| CK Technologies – Brownsville, Texas | A 55-gallon drum of universal waste (paint waste) had lid up and not latched. | 30 TAC 335.262(c)(2)(A) | Ensure all containers of universal waste are kept closed unless adding or removing waste. | 3-2-21 | Curtis |
| Vermillion | No current waste profiles were found on-site. | Recommendation | Contact Safety Kleen to get copies of current profiles. Review applicable processes and waste streams in order to create/update waste profiles with accurate waste codes. Waste profile codes should match waste determination codes. | Amanda | 7-23-18 |
| Vermillion | A copy of the PowerPoint for the 2017 Hazardous Waste Handlers’ training could not be located during the audit. | Recommendation | iSi recommends maintaining copies of the PowerPoint on file along with the sign-in sheets. | Amanda | 7-23-18 |
| Cascade Engineering – Grand Rapids – MI Part 1 | The East Plant is currently listed and regulated as a Small Quantity Generator (SQG). | Recommendation | The East Plant should have a hazardous waste inventory done to calculate the monthly generation and total accumulation of hazardous waste. Once done, if the facility is below 220 lbs/month generation and 2,200 lbs total one-time storage, the facility should notify EGLE to reclassify as a Very Small Quantity Generator (VSQG) to avoid several regulatory requirements. | 2-18-21 | Curtis |
| Cascade Engineering – Grand Rapids – MI Part 1 | Current access to historical hazardous waste generator documents can be hard to retrieve accurately. | Recommendation | With the passage of the e-Manifest rule from EPA in 2018, the company should sign up for an account on RCRAinfo to see the current site information as well as historical manifests starting in 2018. | 2-18-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | Site is currently registered as a SQG. Due to current hazardous waste generation levels and Ohio state-specific rules allowing paint and paint related waste to be universal waste, the site should reclassify as a Very Small Quantity Generator (VSQG). | Recommendation  OAC 3745-273-89(C) | Recommend updating generator status to VSQG. Benefits are overall reduction in regulatory burden and less likely to be inspected by Ohio EPA or federal EPA. See Appendix G. | 12-16-21 | Curtis |
| **Aboveground and Underground Storage Tanks (AST’s and UST’s) – Chapter I Subchapter I – Solid Waste (40 CFR 280-282)** | | | | | |
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| **Emergency Planning and Community Right-to-Know (EPCRA) – Chapter I Subchapter J (40 CFR 370)** | | | | | |
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| Learjet – Bridgeport, WV |  | 40 CFR 355.20(b) and 40 CFR 370.42(o) |  | April 2018 | Golder |
| USD259 | The last Tier II that was found on file was from 2011. | K.A.R. 28-65-1  40 CFR 370 | Ensure that a Tier II report is completed for all applicable chemicals on-site annually and submitted to KDHE and local agencies by March 1st of every year. | Amanda | 7-30-18 |
| USD259 | A large amount of lead acid batteries were observed throughout the facility either inside of equipment or in storage (photo 27). | K.A.R. 28-65-1  40 CFR 370 | Ensure that determination has been made to account for the amount of Lead and Sulfuric Acid that are in Lead Acid batteries that stored on-site. | Amanda | 7-30-18 |
| Learjet – Fort Lauderdale |  | 40 CFR 370  27P-14.003(1) and 27P-14.005 FAC |  | October 2017 | Golder |
| Hillsboro | Annual Tier II reports were not available for review for reporting years 2014 and 2015 | EPCRA 311/312  40 CFR 355 | Tier II reports and/or a determination is required on an annual basis. These files are to be maintained for 5-years. | Bria | 7-10-19 |
| Hartford – Learjet | The reporting year 2016 Tier II inventory report indicates that the maximum quantity of Jet A stored in a single container is 20,000 pounds. The largest container on-site is a 20,000 gallon tank so the maximum quantity should have been listed as approximately 134,200 pounds. The report also did not indicate that the site is a Section 302 facility. However, sulfuric acid, a Section 302 chemical, is on- site in quantities greater than the threshold planning quantity so the Secti... | 40 CFR 370.10 |  | 2017 | Golder |
| Learjet – Dallas | Diesel storage capacity in the fire pump and generator storage tanks total 1,600 gallons or approximately 11,840 pounds. Diesel fuel was not included on the reporting years 2017 and 2018 Tier II Inventory reports. | 40 CFR 370.10  25 TAC 295.182 | Facilities storing any EHS that meets or exceeds the TPQ or 500 pounds, whichever is less, at any one time, or any hazardous chemical for which OSHA requires a SDS that meets or exceeds 10,000 pounds at any one time shall submit an inventory form (Tier II) to the SERC, the LEPC, and the fire department with jurisdiction over the facility by March 1 of each year. The inventory shall contain information on hazardous chemicals present at the facility during the preceding calendar year above threshold levels. | Sept 2019 | Golder |
| Cascade Engineering – Grand Rapids, MI Part 1 | While Tier II reports are submitted for lead-acid batteries, no documentation was available to demonstrate a full evaluation is completed to validate other substances do not require reporting. | Recommendation  40 CFR 370.10 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by EGLE or EPA. | 2-18-21 | Curtis |
| CK Technologies – Brownsville, Texas | No documentation was available to demonstrate a full evaluation is completed to validate hazardous or extremely hazardous substances do not require reporting by sections 302 and 312 of EPCRA. | Recommendation  40 CFR 370.10 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by TCEQ or EPA. | 3-2-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | No documentation was available to demonstrate a full evaluation is completed to validate hazardous or extremely hazardous substances do not require reporting by sections 302 and 312 of EPCRA. | Recommendation  40 CFR 370.10 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by NCDEQ or EPA. | 4-14-21 | Curtis |
| Global Parts | No documentation was available to demonstrate a full evaluation is completed to validate hazardous or extremely hazardous substances (EHS) do not require reporting by sections 302 and 312 of EPCRA. | Recommendation  40 CFR 370.10 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by KDHE or EPA.  Facilities storing any EHS that meets or exceeds the threshold planning quantity (TPQ) or 500 pounds, whichever is less, at any one time, or any hazardous chemical for which OSHA requires a SDS that meets or exceeds 10,000 pounds at any one time shall submit an inventory form (Tier II) to the KDHE, the LEPC, and the fire department with jurisdiction over the facility by March 1 of each year. | 8-19-21 | Curtis |
| Max | No documentation was available to demonstrate a full evaluation is completed to validate hazardous or extremely hazardous substances do not require reporting by sections 302 and 312 of EPCRA.  The metal working fluid Xtreme Cut 250C is not considered hazardous according to the SDS from QualiChem. There are 7 totes of sodium hydroxide solution for pH adjustment of the wastewater treatment system (See Photo 11) which are corrosive. There is a 2,000-pound battery in a powered industrial truck that would contain sulfuric acid which is reportable at 500 pounds of sulfuric acid (See Photo 12). All chemical storage used in maintenance and spray painting needs to be evaluated. | 40 CFR 370.10  K.A.R. 28-65-1 | Facilities storing any Extremely Hazardous Substances (EHS) that meets or exceeds the threshold planning quantity (TPQ) or 500 pounds, whichever is less, at any one time, or any hazardous chemical for which OSHA requires a safety data sheet (SDS) that meets or exceeds 10,000 pounds at any one time shall submit an inventory form (Tier II) to the KDHE, the local emergency planning committee (LEPC), and the fire department with jurisdiction over the facility by March 1 of each year.  It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by KDHE or EPA. | 11-24-21 | Curtis |
| Ultra Clean Midwest | The facility stores (See Photo 4):   * 4 drums of sulfuric acid at 700 pounds per drum for a total of 2,800 pounds * 4 drums of nitric acid at 145 pounds per drum for a total of 580 pounds * 11 drums of phosphoric acid at 700 pounds per drum for a total of 7,700 pounds   Both sulfuric and nitric acid are considered an Extremely Hazardous Substance (EHS) and require reporting by Section 302 of the Emergency Planning and Community Right-to-Know act (EPCRA). Phosphoric acid is a hazardous substance but only requires reporting at 10,000 pounds on-site. At the time of the audit, neither sulfuric nor nitric acid have been reported to the Missouri Emergency Response Commission (MERC), Local Emergency Planning Committee (LEPC), and local fire department / district with jurisdiction on an annual basis. | 40 CFR 370.10  11 CSR 10-11.240 | Facilities storing any EHS that meets or exceeds the threshold planning quantity (TPQ) or 500 pounds, whichever is less, at any one time, or any hazardous chemical for which OSHA requires a SDS that meets or exceeds 10,000 pounds at any one time shall submit an inventory form (Tier II) to the MERC, the LEPC, and the fire department with jurisdiction over the facility by March 1 of each year.  Records should be maintained at the facility and be readily available for purposes of inspection by Missouri Department of Public Safety or EPA. | 12-8-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | The facility is reporting on sulfuric acid, which is present in lead-acid batteries for powered industrial trucks, at a total of 7,300 pounds, but is not including any mention or description on the lead content in the batteries, which most likely exceeds 10,000 pounds. All hazardous chemicals for which facilities are required to have or prepare a safety data sheet (SDS) must report starting at a threshold of 10,000 pounds to the State Emergency Response Commission (SERC), the Local Emergency Planning Committee (LEPC), and the local fire department having jurisdiction. | 40 CFR 370.10  40 CFR 370.40  Ohio Revised Code Chapter 3750 | Ensure the report mentions both sulfuric acid and lead if both are triggered. If the substances are reported combined for lead-acid batteries, ensure both substance’s hazards are identified and the mixture components are described. Applicable fees apply to both substances. | 12-16-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | Further documentation of applicability to sections 302 and 312 EPCRA should be completed. The facility stores many drums of paint products and numerous compressed gas cylinders (See Photo 3). | Recommendation  40 CFR 370.10  Ohio Revised Code Chapter 3750 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by Ohio EPA or federal EPA. | 12-16-21 | Curtis |
| Hillsboro | The facility is currently reporting 174,586 pounds of argon onsite. Based on the small tank on the west side of the facility and limited number of compressed argon cylinders in the facility, this number is too high. | 40 CFR 370.10  K.A.R. 28-65-1 | New calculations should be completed to obtain a more accurate weight. Quantities are counted based on maximum and average inventory at any one time at the facility. | 8-30-22 | Curtis |
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| **Toxic Release Inventory (TRI) – Chapter I Subchapter J (40 CFR 372)** | | | | | |
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| USD259 | No determination was on file to determine if the facility is applicable to Section 313 Toxic Release Inventory. | 40 CFR 372 | The facility must retain data supporting the determination of whether a threshold applies for each toxic chemical for a period of 3 years from the date of the submission of a Toxic Chemical Inventory (TRI) report.  Records must be maintained at the facility and be readily available for purposes of inspection by EPA. | Amanda | 7-30-18 |
| Vermillion | A copy of the 2017 Form R Determination could not be located during the audit. | Recommendation | Ensure that all reports/report determinations are kept on file. iSi recommends keeping all environmental files in the same location. | Amanda | 7-23-18 |
| Hillsboro | Annual SARA 313/Form R reports were not available for review for reporting years 2014 and 2015. | EPCRA 313 | Sara 313/Form R reports and/or a determination is required on an annual basis. These files are to be maintained for 5–years. | Bria | 7-10-19 |
| Cascade Engineering – Grand Rapids, MI Part 1 | No written determination was available to determine if the facility is applicable to SARA 313 Toxic Release Inventory (TRI). | Recommendation  40 CFR 372 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by EGLE or EPA. | 2-18-21 | Curtis |
| CK Technologies – Brownsville, Texas | A written determination was not readily available to determine if the facility is applicable to SARA 313 Toxic Release Inventory (TRI). | Recommendation  40 CFR 372 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately. If ERA Environmental is performing this task, it is best to save the evaluation outside of their software in case the vendor is changed or access is restrictive.  Records should be maintained at the facility and be readily available for purposes of inspection by TCEQ or EPA. | 3-2-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | ERA Environmental is documenting air emissions quantities for the air permit, which captures many processes and substances, which are captured under SARA 313 Toxic Release Inventory (TRI); however, no full evaluation is documented for a threshold determination. | Recommendation  40 CFR 372 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by NCDEQ or EPA. | 4-14-21 | Curtis |
| Global Parts | No written determination was available to determine if the facility is applicable to SARA 313 Toxic Release Inventory (TRI). | Recommendation  40 CFR 372 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by KDHE or EPA. | 8-19-21 | Curtis |
| Max | A written determination was not available to determine if the facility is applicable to Superfund Amendments and Reauthorization Act (SARA) 313 Toxic Release Inventory (TRI). The facility processes metal parts for the aerospace industry including aluminum, stainless steel, and titanium. Aluminum metals contain chromium, copper, and manganese. Stainless steel metals contain chromium, nickel, and copper. All these metals are reportable at 25,000 pounds of processing on an annual basis. The facility also spray paints with chromium compounds which are reportable at 10,000 pounds of use on an annual basis. | Recommendation  40 CFR 372  K.A.R. 28-65-1 | It is best practice to fully document an annual evaluation to validate all applicable substances meeting threshold levels are being reported accurately.  Records should be maintained at the facility and be readily available for purposes of inspection by KDHE or EPA. | 11-24-21 | Curtis |
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| **Wastewater – Chapter I Subchapter N (40 CFR 400-471)** | | | | | |
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| Learjet – Tucson, AZ | The pH buffers used to calibrate the pH meters were marked with an expiration date of June 2015 for the pH 4.01 buffer. | 40 CFR 136 Table IB  Pima County Industrial Wastewater Discharge Permit No. 10707, Part I.A.3.b | All samples shall be collected, preserved, and analyzed using an appropriate EPA method reference in 40 CFR 136.  Note: 40 CFR 136 allows several different methods for pH monitoring including ASTM D1293-99, Standard Method 4500-H+, and USGS 974.27. Each standard includes discussions on buffer handling and replacement. USGS 974.27 clearly states pH buffers must be discarded on their expiration dates. | August 2017 | Golder |
| Max | The facility is completing environmental field tests for hydrogen ion (pH) as required by the industrial wastewater pre-treatment permit for the City of Wichita for wastewater discharges, but does not maintain Environmental Field Laboratory Accreditation with KDHE. | 40 CFR 136  K.A.R. 28-15-36a | Complete and submit the application for Environmental Field Laboratory Accreditation to KDHE’s Environmental Laboratory Accreditation Program Office with applicable fees. Accreditation is required every 3 years. | 11-24-21 | Curtis |
| USD259 | Water from the waterfall spray booth is being sent to the Publically Owned Treatment Works (POTW). A Memo dated January 26, 1995 was found on file that showed analytical from 1994. The results indicated that the water was over the regulatory limits for Chromium, Zinc, and Lead. No approval from the City of Wichita was found on file in order to send this waste stream to the POTW (photo 6). | 40 CFR 403.5(b) and (c) | If discharge water is sent to the sewer, USD 259 should obtain approval from the POTW for the discharge. | Amanda | 7-30-18 |
| USD 259 | Ultra-power B2B is used clean instruments. This material is then rinsed off of instruments into a sink which is then sent to the POTW (Photo 9-10). | 40 CFR 403.5(b) and (c) | If discharge water is sent to the sewer, USD 259 should obtain approval from the POTW for the discharge. | Amanda | 7-30-18 |
| USD 259 | A washing machine was observed that is washing rags on-site (photo 12). | 40 CFR 403.5(b) and (c) | If discharge water is sent to the sewer, USD 259 should obtain approval from the POTW for the discharge. | Amanda | 7-30-18 |
| USD 259 | Several floor sinks, gratings in the floor and compressor blowdown are discharging to the POTW (photos 15-16, 47, and 50). | 40 CFR 403.5(b) and (c) | If discharge water is sent to the sewer, USD 259 should obtain approval from the POTW for the discharge. | Amanda | 7-30-18 |
| Vermillion | Vermillion currently discharges compressor condensate water to a bucket that potentially is emptied into the sanitary sewer (photo 14). | 40 CFR 403.5(b) and (c) | If discharge water is emptied to the sewer, Vermillion should obtain approval from the POTW for the discharge. | Amanda | 7-23-18 |
| Hillsboro | Air compressor blowdown is discharged to the publically owned treatment works (POTW). Written approval from the POTW was not recovered by Hillsboro Industries. | 40 CFR 403.5(b) and (c) | If discharge water is sent to the POTW, Hillsboro Industries should obtain written approval from the POTW for the discharge.  It is recommended that the blowdown be containerized in a container labeled, “Used Oil” and discharged through the facilities wastewater discharge system via the wastewater discharge permit. | Bria | 7-10-19 |
| BG Products | Need individual authorization for floor scrubber water from City of Derby POTW to discharge | 40 CFR 403.5(b) and (c) |  | Curtis | 7-27-21 |
| Global Parts | Need individual authorization for mop bucket water (See Photo 1) from City of Augusta POTW to discharge. | 40 CFR 403.5(b) and (c) | If discharging non-domestic (industrial) wastewater to the POTW, written approval must be obtained from the POTW for the discharge in the form of an individual authorization. | 8-19-21 | Curtis |
| Pet-Ag | The facility does not have written individual authorization for industrial wastewater discharges including sanitation chemicals and mop bucket water from Village of Hampshire POTW to discharge. | 40 CFR 403.5(b) and (c) | If discharging non-domestic (industrial) wastewater to the POTW, written approval must be obtained from the POTW for the discharge in the form of an individual authorization. | 9-14-21 | Curtis |
| Learjet – Wichita | No records were available to demonstrate that a self-monitoring report had been submitted for Outfall 2 (Site Code BOMB003) for the second half of 2018. Analytical records for the time period were available for the outfall, but the results appear not to have been submitted to  the city. | City of Wichita Wastewater Discharge Permit 2032, September 25, 2017,  Sections IV and V | Semi-annual sampling must be completed for parameters identified in the permit for Outfall 2 (Site Code BOMB003). Self-monitoring reports must be submitted by the last day of the month following the reporting period (e.g., January 31 for the previous July through December). | June 2019 | Golder |
| Max | Wastewater pH calibrations are not being checked against a different lot number of pH buffer solution,   1. After calibration and before sample testing and,   After sample testing. | K.A.R. 28-15-36(a)(f) | Add additional steps in the daily pH calibration to check the pH probe against another lot number of pH buffer solution with a pH of 7 before and after sampling testing. The pH probe must be ± 0.1 pH on the check step for NPDES compliance monitoring. | 11-24-21 | Curtis |
| Hillsboro Industries | Wastewater pH calibration is only being completed on a weekly or less basis (see Photo 1). | K.A.R. 28-15-36a(f)(2)  40 CFR 136 | Each instrument being used for field laboratory analysis shall be calibrated on each day of use. | 6-17-21 | Curtis |
| Hillsboro Industries | Employee personnel files were not available for employees completing pH monitoring. | K.A.R. 28-15-36a(h) | Complete a KDHE personnel information document for each employee conducting pH analysis and keep on file. | 6-17-21 | Curtis |
| Max | Employee personnel files were not available for employees completing wastewater pH monitoring. | K.A.R. 28-15-36a(h) | Complete a KDHE personnel information document for each employee conducting pH analysis and keep on file. | 11-24-21 | Curtis |
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| **Toxic Substance Control Act (TSCA) (40 CFR 700-799)** | | | | | |
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| USD259 | Drums of non PCB ballast were either not labeled or not dated (photos 40-42). | 40 CFR 761 | Ensure all ballast (PCB and non PCB) are dated when the first ballast is generated. Ballast waste must be shipped off-site within a year of generation. | Amanda | 7-30-18 |
| USD259 | PCB and non PCB ballasts are not being segregated. All drums are labeled as non PCB | 40 CFR 761 | PCB and non PCB ballasts must be segregated. PCB ballasts must also contain a warning label noting that they contain PCBs. | Amanda | 7-30-18 |
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| Hillsboro | PCB/non PCB ballast was observed abandoned in the facility. (Photo 11) | 40 CFR 761 | Ensure all ballast (polychlorinated biphenyl (PCB) and non-PCB) are dated when the first ballast is generated. Ballast waste must be shipped off-site within a year of generation.  PCB and non PCB ballasts must be segregated. PCB ballasts must also contain a warning label noting that they contain PCBs. | Bria | 7-10-19 |
| **Department of Transportation (DOT) (49 CFR 100-180)** | | | | | |
| Ultra Clean Midwest | Based on recent hazardous waste manifests, the facility is offering quantities of hazardous material that require placarding but is not registered with the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA). Facility registration expired 6-30-2020. Manifest on 11-15-21 shipped 26,240 pounds of a Class 8 substance. Class 8 corrosive liquids require placarding at 1,001 pounds. Offerors and transporters of certain quantities and types of hazardous materials, including hazardous wastes, are required to file a registration statement with the U.S. Department of Transportation and to pay a fee. | 49 CFR 107.601(a) | Submit a renewal registration to the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration for activities as a shipper along with applicable fee for the facility. Registrations can be completed on one, two, or three-year frequencies and must be completed by June 30th of the expiring year. | 12-8-21 | Curtis |
| CK Technologies – Mount Airy, North Carolina | Based on recent hazardous waste manifests, the facility is offering quantities of hazardous material that require placarding but are not registered with the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA). Manifest on 2-4-21 shipped 1,500 pounds of a Class 3 substance and manifest on 3-12-21 shipped 1,200 pounds of a Class 3 substance. Class 3 flammable liquids required placarding at 1,001 pounds. Offerors and transporters of certain quantities and types of hazardous materials, including hazardous wastes, are required to file a registration statement with the U.S. Department of Transportation and to pay a fee. | 49 CFR 107.601(a)(6) | Submit an initial registration to the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration for activities as a shipper along with applicable fee for the facility. Registrations can be completed on one, two, or three-year frequencies and must be completed by June 30th of the expiring year. | 4-14-21 | Curtis |
| Global Parts | Based on recent hazardous waste manifests, the facility is offering quantities of hazardous material that require placarding but are not registered with the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA). Manifest on 3-30-21 shipped 4,660 pounds of a Class 3 substance. Class 3 flammable liquids required placarding at 1,001 pounds. Offerors and transporters of certain quantities and types of hazardous materials, including hazardous wastes, are required to file a registration statement with the U.S. Department of Transportation and to pay a fee. | 49 CFR 107.601(a)(6) | Submit an initial registration to the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration for activities as a shipper along with applicable fee for the facility if future shipments exceed thresholds. Registrations can be completed on one, two, or three-year frequencies and must be completed by June 30th of the expiring year. See Appendix E for placarding weights. | 8-19-21 | Curtis |
| Perfekta | Based on recent hazardous waste manifests, the facility is offering quantities of hazardous material that require placarding but are not registered with the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration (PHMSA). Manifests on 12-10-21 shipped 1,400 pounds, 10-25-21 shipped 1,200 pounds, and November 2020 shipped 1,200 lbs of class 4.1 flammable solids which required placarding at 1,001 pounds. Offerors and transporters of certain quantities and types of hazardous materials, including hazardous wastes, are required to file a registration statement with the U.S. Department of Transportation and to pay a fee. | 49 CFR 107.601(a)(6) | Submit an initial registration to the U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration for activities as a shipper along with applicable fee for the facility if future shipments exceed thresholds. Back registrations can be completed as well for prior years. Registrations can be completed on one, two, or three-year frequencies and must be completed by June 30th of the expiring year. See following pages for placarding weights. | 7-27-22 | Curtis |
| Vermillion | DOT training documents were missing for Willis Pearrow and Grant Williams. | 49 CFR 172.204 – 205  49 CFR 172.704(d) | Ensure that copies of all training records are kept for a minimum of 3 years. | Amanda | 7-23-18 |
| Learjet – Wichita | Biomedical wastes are DOT hazardous  materials when transported. No records of  DOT hazardous materials transportation training were available for two employees who signed biomedical waste shipping papers on  August 8, 2017 and April 17, 2018. | 49 CFR 172 Subpart H | A hazmat employer shall ensure that each of its hazmat employees receives general awareness/familiarization training, function-specific training, safety training, and security awareness training at least once every three years. | June 2019 | Golder |
| Learjet – Dallas | Records of DOT hazardous materials transportation training or hazardous waste management training completed before the time of waste shipment were not available for the person who signed manifest | 49 CFR 172 Subpart H  30 TAC 335.69(f)(5)(c) | A hazmat employer shall ensure that each of its hazmat employees receives general awareness/familiarization training, function-specific training, safety training, and security awareness training at least once every three years.  The generator must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures, relevant to their responsibilities during normal facility operations and emergencies. | Sept 2019 | Golder |
| CK Technologies – Mount Airy, North Carolina | Employees signing off on hazardous waste manifests are getting DOT hazardous materials training, but the training only covers the standard operating procedures for their tasks. Hazmat employee training is required to cover (1) general awareness/familiarization training, (2) function-specific training, (3) safety training, and (4) security awareness training. | 49 CFR 172.704(a) | Retrain DOT hazardous materials employees who sign hazardous waste manifests to the full extent of the training requirements for hazmat employees. Recurrent training must be completed on a three-year frequency. | 4-14-21 | Curtis |
| Ultra Clean Midwest | Employees signing off on hazardous waste manifests are not getting DOT hazardous materials training. Hazmat employee training is required to cover (1) general awareness/familiarization training, (2) function-specific training, (3) safety training, and (4) security awareness training. | 49 CFR 172.704 | Train DOT hazardous materials employees who sign hazardous waste manifests to the full extent of the training requirements for hazmat employees. Recurrent training must be completed on a three-year frequency. | 12-8-21 | Curtis |
| Cascade Engineering – Montpelier, Ohio | The employee signing off on hazardous waste manifests last had DOT hazardous materials training on 1-16-2017, exceeding the 3-year frequency requirement for refresher training. | 49 CFR 172.704(c)(2) | Retrain the DOT hazardous materials employee who signs hazardous waste manifests to the full extent of the training requirements for hazmat employees. Recurrent training must be completed on a 3-year frequency. | 12-16-21 | Curtis |
| USD259 | At the time of the audit it was unclear if the service center was shipping amounts of hazardous waste that would require an annual DOT Registration through PHMSA. | Recommendation | iSi recommends reviewing whether the threshold has been met that would require this registration. | Amanda | 7-30-18 |
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| **Opportunities For Improvement** | | | | | |
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| USD 259 | Several empty drums were observed with hazardous waste labels (photo 23). | Recommendation | Do not label drums with hazardous waste label until drum is in use. | Amanda | 7-30-18 |
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**Machine Guarding is the Real Focus of Renewed OSHA Emphasis Program**

OSHA has updated and renewed its National Emphasis Program on amputations in manufacturing facilities. With this emphasis, OSHA will be targeting manufacturers and industrial facilities, with a focus on machine guarding and lockout-tagout.

**Who’s On the List?**

Machine guarding and lockout-tagout are annual residents on OSHA’s top 10 list of violations and cause amputations and injuries each year. OSHA has had amputations on its national emphasis since before 2015, but they’ve updated it with a new list of potential NAICS codes to target based on data from 2015 to 2018. OSHA is going to target industries with higher rates of machine guarding and lockout-tagout violations, higher rates of related incidents, higher rates of amputations, those with amputations within the past 5 years, and those with machine-related injuries or fatalities. They’ve developed a target list of around 130 targeted NAICS codes.

Companies with less than 10 employees will not be on the target list, even if their NAICS code matches.

Please remember that as with all OSHA emphasis programs, if OSHA is onsite for another inspection, they can add this to their scope.

**What Will Be Looked At?**

In addition to reviewing 4 years of OSHA logs, they will be inspecting your machinery and equipment, looking for hazard potentials in:

* Pinch, Nip and Shear Points
* Cutting Actions
* Setup and Operation
* Clearing Jams or Upsets
* Making Adjustments When Operating
* Cleaning/Greasing/Oiling
* Scheduled and Unscheduled Maintenance
* During the Lockout-Tagout Process

Machine guarding is used to protect both the operator and everyone else who could come in contact with a machine. Any machine, part, function or process that can cause injury must be safeguarded.

The best way to ensure you are ready for an inspection is to make sure you’re compliant with the following standards. These will be the ones used by inspectors as they’re the ones that have the greater potential to cause amputations:

**1910 Subpart J – General Environmental Controls**

1910.147 Control of Hazardous Energy (Lockout-Tagout)

**1910 Subpart O – Machine and Machine Guarding**

1910.212 General Requirements

1910.213 Woodworking Machinery Requirements

1910.217 Mechanical Power Presses

1910.219 Mechanical Power Transmission

**Inspection Start Date**

As with all new and revised emphasis programs, there will be a 90-day period where OSHA will provide outreach efforts to alert the industry about the changes before starting targeted inspections. This puts targeted inspections starting around March 10, 2020.

**More Information**

For more information, check out the [OSHA inspector directive here](https://www.osha.gov/enforcement/directives/cpl-03-00-022), which also includes the affected list of NAICS codes.