

U.S. Department of Labor Occupational Safety and Health Administration
100 N. Summit Street
Suite 100
Toledo, OH 43604



06/17/2024

HK Cooperative, Inc., dba J.H. Routh Packing Company
and its successors
4413 W. Bogart Rd.
Sandusky, OH 44870

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000), which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (419) 259-7542.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,



Todd Jensen
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
100 N. Summit Street
Suite 100
Toledo, OH 43604



Citation and Notification of Penalty

To:
HK Cooperative, Inc., dba J.H. Routh Packing
Company
and its successors
4413 W. Bogart Rd.
Sandusky, OH 44870

Inspection Site:
4413 W. Bogart Rd.
Sandusky, OH 44870

Inspection Number: 1717900
Inspection Date(s): 12/21/2023 - 05/08/2024
Issuance Date: 06/17/2024

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

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

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

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling (419) 259-7542. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From **OSHA Penalty Payment Form** search result, select Continue. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

Notification of Corrective Action – For each violation which you do not contest, you must provide **abatement certification** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that **abatement documentation** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 06/17/2024. The conference will be held by telephone or at the OSHA office located at 100 N. Summit Street, Suite 100, Toledo, OH 43604 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1717900

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870
Issuance Date: 06/17/2024

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 100 N. Summit Street, Suite 100, Toledo, OH 43604.**

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

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

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

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

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

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

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review.



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

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

29 CFR 1910.22(c): The employer did not provide, and ensure each employee uses, a safe means of access and egress to and from walking-working surfaces.

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about January 4, 2024, the employer did not provide employees accessing the tattoo deck above the harvest floor with a safe means of access and egress. Employees were exposed to fall hazards when required to climb a ladder, dismount the ladder, side-step to an adjacent opening at the end of the guardrail, and then proceed to walk to their work area on the platform.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 19, 2024
\$16,131.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.23(b)(8): The employer did not ensure that ladders are used only for the purposes for which they were designed.

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about January 4, 2024, the employer did not ensure the Werner fiberglass step ladder used by employees to access the tattoo deck above the harvest floor was used according to its design. The self-supporting ladder was not unfolded with the locking cross members in place, the top step was being used, and the top of the ladder did not extend at least three feet above the upper landing of the deck, thereby exposing employees to a fall hazard.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 19, 2024
\$0.00



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.28(b)(6)(i): The employer did not ensure that each employee less than 4 feet (1.2 m) above dangerous equipment is protected from falling into or onto the dangerous equipment by a guardrail system or a travel restraint system, unless the equipment is covered or guarded to eliminate the hazard.

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure employees working at the jowl removing station, were protected from fall hazards onto the unguarded auger.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 05, 2024
\$16,131.00



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.28(b)(14)(i): The employer did not protect each employee on the unprotected working side of a slaughtering facility platform that is 4 feet (1.2 m) or more above a lower level from falling by using one of the systems listed in 29 CFR 1910.28(b)(14)(i)(A)-(B):

1910.28(b)(14)(i)(A) Guardrail systems; or
1910.28(b)(14)(i)(B) Travel restraint systems.

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about January 4, 2024, the employer did not ensure employees accessing the tattoo deck above the harvest floor were protected from fall hazards of 10 feet 8 inches. Employees were required to climb a ladder, dismount the ladder, side-step to an adjacent opening at the end of the guardrail, and then proceed to walk to their work area on the platform.

b. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure employees working off the shaver's platform located in the harvest department were protected from fall hazards up to 66 inches to the inside of the platform.

c. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure employees working off the shaver's platform located in the harvest department were protected from fall hazards up to 66 inches to the outside (back side) of the platform.

d. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure employees working off the shaver's platform located in the harvest department were protected from fall hazards up to 66 inches to the outside (back side) of the platform where the access ladder was located.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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

Date By Which Violation Must be Abated:
Proposed Penalty:

June 27, 2024
\$15,211.00



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.37(a)(3): Exit route(s) were not kept free and unobstructed:

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about April 10, 2024, the employer did not ensure the fire exit route from the blood room was unobstructed. There was a large water pump hose blocking the fire egress route from the blood room exposing employees to hazards associated with delayed evacuation during possible emergency event.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

June 27, 2024
\$7,604.00



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.146(c)(3): When the employer decided its employees would not enter permit spaces, the employer did not take effective measures to prevent its employees from entering the permit spaces:

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about April 11, 2024, the employer did not take effective measures to ensure employees were not entering permit required confined spaces. An employee was exposed to confined space hazards when entering equipment such as, but not limited to, the blood tank located in the blood room to perform cleaning activities.

No additional abatement information is needed for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$12,676.00



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

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

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

- a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about April 11, 2024, the employer did not ensure machine specific lockout procedures were developed, documented, and implemented for employees accessing the area under the product dumpers in the cured meats and conversion departments. Employees were exposed to struck-by and crushed-under hazards of a moving dumper during cleaning.
- b. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about April 22, 2024, the employer did not ensure machine specific lockout procedures were developed, documented, and implemented for employees sanitizing the pork shoulder cryovac in the cut department. Employees had their hands exposed to pinch points and caught-in hazards.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: **July 05, 2024**
Proposed Penalty: **\$16,131.00**

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.147(d): The established procedure for the application of energy control (the lockout or tagout procedures) did not cover the actions listed in and was not done in sequence as required by 29 CFR 1910.147(d)(1)-(6):

- 1910.147(d)(1) Preparation for shutdown;
- 1910.147(d)(2) Machine or equipment shutdown;
- 1910.147(d)(3) Machine or equipment isolation;
- 1910.147(d)(4) Lockout or tagout device application;
- 1910.147(d)(5) Stored energy; and,
- 1910.147(d)(6) Verification of isolation.

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure an employee performing sanitation activities on the belly skinner located on the belly line in the cut department, locked out the electrical disconnect prior to disassembling the equipment. The employee was exposed to the hazard of being caught in the rotating drive roller and the top plastic roller if the machine were to unexpectedly start up.

b. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure an employee performing sanitation activities on the back fat skinner on the belly line located in the cut department locked out the electrical disconnect prior to disassembling the equipment. The employee was exposed to the hazard of being caught in the rotating drive roller and the top plastic roller if the machine were to unexpectedly start up.

c. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about April 11, 2024, the employer did not ensure employees accessing the area under the product dumper for the ham injection line in the cured meats department, to remove dropped ham products from the floor, locked out the equipment prior to retrieving the dropped product. The employees were exposed to being struck by the product dumper if the machine were to unexpectedly start up.

d. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about April 11, 2024, the employer did not ensure employees accessing the area under the product dumper for the hock line in the cured meats department, to remove dropped ham products from the floor, locked out the equipment prior to retrieving the dropped product. The employees were exposed to being struck by the product dumper if the machine were to unexpectedly start up.

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

e. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about April 22, 2024, the employer did not ensure an employee performing sanitizing work on the pork shoulder cryovac line located in the cut department, locked out the equipment prior to reaching under the cryovac hood to clean the hood seal and clean the seal bar surface. The employee was exposed to pinch points if the platnum were to move or the cryovac hood were to lower.

As a result, the remaining applicable energy control elements, involving machine isolation [1910.147(d)(3)], lock-out/tag-out device application [1910.147(d)(4)], dissipation of residual energy [1910.147(d)(5)], and verification of isolation [1910.147(d)(6)] were not implemented to protect employees from struck-by and caught-in-between hazards while employees were conducting activities such as, but not limited to, cleaning and retrieving product from the floor under the product dumpers, and sanitizing equipment on belly lines and the platnums on the cryovac.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	July 05, 2024
Proposed Penalty:	\$0.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.147(c)(7)(i)(A): Authorized employee(s) did not 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.

- a. HK Cooperative, Inc. dba J. H. Routh Packing Company on or about December 21, 2023, the employer did not ensure employees performing sanitizing activities on the belly skinner in the cut department were trained as lockout authorized employees, exposing them to the hazard of being caught in the rotating rollers.
- b. HK Cooperative, Inc. dba J. H. Routh Packing Company on or about December 21, 2023, the employer did not ensure employees performing sanitizing activities on the backfat skinner in the cut department were trained as lockout authorized employees, exposing them to the hazard of being caught in the rotating rollers.
- c. HK Cooperative, Inc. dba J. H. Routh Packing Company on or about April 11, 2024, the employer did not ensure employees cleaning and retrieving dropped pork hocks from under product dumpers in the cured meats department were trained as authorized employees, exposing them to the hazard of being crushed by the raised totes.
- d. HK Cooperative, Inc. dba J. H. Routh Packing Company on or about April 22 2024, the employer did not ensure employees sanitizing the pork shoulder cryovac in the cut department were trained as authorized employees under the company's lockout program, exposing them to the hazard of being caught in the pinch point created by the moving platnums and fixed portions of the equipment.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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

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

Inspection Number: 1717900
Inspection Date(s): 12/21/2023 - 05/08/2024
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

Date By Which Violation Must be Abated:
Proposed Penalty:

July 05, 2024
\$16,131.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

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

- a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the front foot saw conveyor located on the shoulder line in the cut department was properly guarded in that employees were exposed to shear point hazards between the conveyor flights and the conveyor frame as the flights traveled around the end of the conveyor which could result in amputation injuries.
- b. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the product dumper for the ham injector line located in the cured meats department was properly guarded in that employees were exposed to crushing hazards between the product dumper and the guard rail surrounding the product dumper which could result in crushing injuries.
- c. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the product dumper for the ham hock line located in the cured meats department was properly guarded in that employees were exposed to crushing hazards between the product dumper and the guard rail surrounding the product dumper which could result in crushing injuries.
- d. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the product dumper for the ham line located in the conversion department was properly guarded in that employees were exposed to crushing hazards between the product dumper and the guard rail surrounding the product dumper which could result in crushing injuries.
- e. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the loin line band saw located in the conversion department was properly guarded in that employees were exposed to caught-in hazards from the unguarded upper blade guide wheel on the saw which could result in amputation injuries.
- f. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the pork shoulder cryo-vac line located in the cut department was properly guarded in that employees were exposed to a shear point between the moving platnum and a horizontal bottom plate which could result in amputation injuries.

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

g. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the pork butt cryo-vac line located in the cut department was properly guarded in that employees were exposed to a shear point between the moving platnum and the nylon rail which could result in amputation injuries.

h. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the pork butt cryo-vac line located in the cut department was properly guarded in that employees were exposed to a shear point between the moving platnum and the upright rear post which could result in broken bones.

i. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the wire conveyor exiting the pork shoulder steam tunnel located in the cut department was properly guarded in that employees were exposed to crushing hazards between the conveyor tines and the fixed exit chute of the tunnel which could result in amputation injuries.

j. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about January 4, 2024, the employer did not ensure the squeeze conveyor located on the harvest floor was properly guarded in that employees were exposed to crushing hazards as the gaps between the conveyor slats traveled around the end of the conveyor and closed which could result in broken bones and amputations.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 05, 2024
\$16,131.00

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

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

Inspection Number: 1717900
Inspection Date(s): 12/21/2023 - 05/08/2024
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.212(a)(3)(ii): Point of operation guards were not designed and constructed as to prevent the operator from having any part of their body in the danger zone during the operating cycle:

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the loin line band saw located in the cut department was properly guarded in that employees were exposed to contact with the unused and unguarded portion of the running blade likely to result in severe laceration when cutting pork loins.

No additional abatement information is needed for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$12,676.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.212(a)(5): Fan blade guard(s) were not provided where the periphery of the blades was less than seven feet from the floor or working level:

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the electric motor for the loin boxing line conveyor was guarded to protect employees from being exposed to the rotating cooling blades' caught-in hazards likely to result in laceration.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 19, 2024
\$15,211.00



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.219(c)(2)(i): All exposed part(s) of horizontal shafting seven (7) feet or less from floor or working platform were not protected by stationary casing(s) enclosing shafting completely or by trough(s) enclosing sides and top or sides and bottom of shafting:

- a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the powered horizontal drive shaft on the ham line skin conveyor located in the conversion department, approximately 4 feet above the work surface, was properly guarded to protect employees from caught -in hazards created by the rotating shaft.
- b. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the powered horizontal drive shaft on the ham line trim calis conveyor located in the cut department, approximately 3 feet above the floor, was properly guarded to protect employees from caught-in hazards created by the rotating shaft.
- c. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the powered horizontal drive shaft on the belly transfer conveyor located in the cut department, approximately 5 feet above the working surface, was properly guarded to protect employees from caught-in hazards created by the rotating shaft.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 05, 2024
\$16,131.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.219(c)(3): Vertical or inclined shafting seven (7) feet or less from floor or working platform was not enclosed with stationary casing(s):

- a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the powered vertical drive shaft on the Citrate #1 mix tank located in the blood room was properly guarded to protect employees from crushing injuries created by the rotating shaft.
- b. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the powered vertical drive shaft on the Citrate #2 mix tank located in the blood room was properly guarded to protect employees from crushing injuries created by the rotating shaft.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	July 05, 2024
Proposed Penalty:	\$12,676.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

Citation 1 Item 13 Type of Violation: **Serious**

29 CFR 1910.219(e)(1)(i): Horizontal belts which had both runs seven feet or less from the floor level were not guarded with a guard that extended to at least fifteen inches above the belt:

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023 the employer did not ensure employees were protected from caught in hazards while placing boxes on the hind foot box conveyor directly above unguarded nip points between the belt and the drive roller and between the belt and the conveyor rollers at the pressure roller. Employees were placing boxes within inches of the ingoing nip points.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 05, 2024
\$12,676.00

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

Inspection Number: 1717900
Inspection Date(s): 12/21/2023 - 05/08/2024
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.219(f)(3): Sprocket wheels and chains which were seven (7) feet or less above floors or platforms were not enclosed:

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the chain and sprocket drive system on the overhead mono-chain conveyor above the shaver platform located on the harvest floor approximately 6 feet above the work platform, was properly guarded to protect employees from ingoing nip points created by the rotating chain and sprocket drive wheel.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 05, 2024
\$12,676.00

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

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

Inspection Number: 1717900
Inspection Date(s): 12/21/2023 - 05/08/2024
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

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

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about January 4, 2024, the employer did not ensure multiple oxygen and acetylene cylinders stored together outside on the West side of the facility, were separated thereby exposing employees to a fire hazard.

No additional abatement information is needed for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$12,676.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.305(b)(1)(i): Conductors entering cutout boxes, cabinets, or fittings were not protected from abrasions:

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the energized electrical conductors exiting the loin boxing conveyor's control panel located in the cut department were protected from abrasions. The liquid tight conduit had been pulled away from its connector on the bottom of the panel exposing employees to electrical shock.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	July 19, 2024
Proposed Penalty:	\$10,140.00

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

Inspection Number: 1717900
Inspection Date(s): 12/21/2023 - 05/08/2024
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.305(d)(2): Panelboards, other than the dead front externally-operable type and accessible only to qualified persons, were not mounted in cabinets, cutout boxes, or enclosures designed for the purpose and/or were not dead front:

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about January 4, 2024, the employer did not ensure the energized 220 volt electrical panel located in the barn was equipped with a dead front covering the exposed live parts, thereby exposing employees to electrical shock hazards.

No additional abatement information is needed for this item.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$12,676.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.305(g)(1)(iv)(A): Flexible cords and/or cables were used as a substitute for the fixed wiring of a structure:

- a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about January 4, 2024, flexible cords located above the squeeze conveyor on the harvest floor, used to power equipment such as but not limited to the squeeze conveyor and ceiling mounted fans, were used as a substitute for fixed wiring.
- b. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about January 4, 2024, flexible cords located in the chute area between the barn and the harvest floor, used to power equipment such as but not limited to the wall heater and ceiling mounted lights, were used as a substitute for fixed wiring.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	July 19, 2024
Proposed Penalty:	\$10,140.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

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

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure employees were protected from hazards associated with live electricity when troubleshooting and replacing a three-phase 480-volt electrical motor for the ham injector line in the cured meats department by providing adequate training in and becoming familiar with the following topics:

1. What tasks require electrical protective equipment;
2. What electrical protective equipment needs to be worn;
3. How to inspect electrical protective equipment;
4. How to inspect electrical testing equipment;
5. How to perform a live dead live test with electrical testing equipment; and,
6. Arc flash hazards.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	July 19, 2024
Proposed Penalty:	\$12,676.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

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

29 CFR 1910.333(a): Safety-related work practices were not employed to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, when work was performed near or on equipment or circuits which were or could be energized:

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure electrical safe work practices were employed when employees performed work on electrical equipment such as, but not limited to, replacing three phase electrical motors. Employees were exposed to contact with live electricity likely to result in electrocution when performing maintenance work on these systems.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: July 19, 2024
Proposed Penalty: \$12,676.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

Citation 1 Item 21 Type of Violation: **Serious**

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

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure an employee who was troubleshooting a 480-volt, three phase electric motor for the ham injector line in the cured meats department was wearing electrical protective equipment for the face, head, torso, legs, and hands. The employee was exposed to electrical shock and arc blast when troubleshooting with an electrical testing meter.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 19, 2024
\$12,676.00

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

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

Inspection Number: 1717900
Inspection Date(s): 12/21/2023 - 05/08/2024
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

Citation 3 Item 1 Type of Violation: **Other-than-Serious**

29 CFR 1910.37(b)(2): Each exit was not clearly visible and marked by a sign reading "Exit":

a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about December 21, 2023, the employer did not ensure the single exit door located in the blood room was labeled as a fire exit.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

Date By Which Violation Must be Abated:
Proposed Penalty:

July 05, 2024
\$0.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

Citation 3 Item 2 Type of Violation: **Other-than-Serious**

29 CFR 1910.147(c)(5)(ii)(D): Lockout devices and tagout devices did not indicate the identity of the employee applying the device(s):

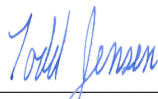
a. HK Cooperative, Inc. dba J. H. Routh Packing Company located in Sandusky Ohio: On or about April 10, 2024, the employer did not ensure the two lockout locks applied to the electrical disconnects for the large and small polishers located on the harvest floor, indicated the identity of the sanitation employee that applied them prior to performing the sanitation work.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

June 27, 2024
\$0.00



Todd Jensen
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
100 N. Summit Street
Suite 100
Toledo, OH 43604



**INVOICE /
DEBT COLLECTION NOTICE**

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870
Issuance Date: 06/17/2024

Summary of Penalties for Inspection Number: 1717900

Citation 1 Item 1a, Serious	\$16,131.00
Citation 1 Item 1b, Serious	\$0.00
Citation 1 Item 2, Serious	\$16,131.00
Citation 1 Item 3, Serious	\$15,211.00
Citation 1 Item 4, Serious	\$7,604.00
Citation 1 Item 5, Serious	\$12,676.00
Citation 1 Item 6a, Serious	\$16,131.00
Citation 1 Item 6b, Serious	\$0.00
Citation 1 Item 7, Serious	\$16,131.00
Citation 1 Item 8, Serious	\$16,131.00
Citation 1 Item 9, Serious	\$12,676.00
Citation 1 Item 10, Serious	\$15,211.00
Citation 1 Item 11, Serious	\$16,131.00
Citation 1 Item 12, Serious	\$12,676.00
Citation 1 Item 13, Serious	\$12,676.00
Citation 1 Item 14, Serious	\$12,676.00
Citation 1 Item 15, Serious	\$12,676.00
Citation 1 Item 16, Serious	\$10,140.00
Citation 1 Item 17, Serious	\$12,676.00
Citation 1 Item 18, Serious	\$10,140.00
Citation 1 Item 19, Serious	\$12,676.00
Citation 1 Item 20a, Serious	\$12,676.00
Citation 1 Item 20b, Serious	\$0.00
Citation 1 Item 21, Serious	\$12,676.00
Citation 2 Item 1, Repeat - Serious	\$63,382.00
Citation 3 Item 1, Other-than-Serious	\$0.00
Citation 3 Item 2, Other-than-Serious	\$0.00

TOTAL PROPOSED PENALTIES: \$345,234.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the

uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From the **OSHA Penalty Payment Form** search result, select Continue. The direct link is: <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

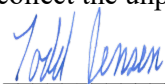
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.

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

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Todd Jensen

Area Director

June 17, 2024

Date

U.S. Department of Labor Occupational Safety and Health Administration
100 N. Summit Street
Suite 100
Toledo, OH 43604



06/17/2024

HK Cooperative, Inc., dba J.H. Routh Packing Company
and its successors
4413 W. Bogart Rd.
Sandusky, OH 44870

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000), which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (419) 259-7542.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,

A handwritten signature in blue ink that reads "Todd Jensen". The signature is written in a cursive style.

Todd Jensen
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
100 N. Summit Street
Suite 100
Toledo, OH 43604



Citation and Notification of Penalty

To:
HK Cooperative, Inc., dba J.H. Routh Packing
Company
and its successors
4413 W. Bogart Rd.
Sandusky, OH 44870

Inspection Site:
4413 W. Bogart Rd.
Sandusky, OH 44870

Inspection Number: 1719541
Inspection Date(s): 01/04/2024 -
Issuance Date: 06/17/2024

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

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

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

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling (419) 259-7542. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From **OSHA Penalty Payment Form** search result, select Continue. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

Notification of Corrective Action – For each violation which you do not contest, you must provide **abatement certification** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that **abatement documentation** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 06/17/2024. The conference will be held by telephone or at the OSHA office located at 100 N. Summit Street, Suite 100, Toledo, OH 43604 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1719541

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870
Issuance Date: 06/17/2024

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 100 N. Summit Street, Suite 100, Toledo, OH 43604.**

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

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

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

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

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

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

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review.



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.95(d)(1): When information indicated that any employee's exposure equaled or exceeded the 8-hour time-weighted average of 85 decibels, the employer did not develop and implement a monitoring program:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer did not develop and implement a monitoring program for employees who were exposed to noise levels above an 8-hour time-weighted average of 85 dBA. Employees working in areas such as, but not limited to, the cut floor, kill floor, and conversion were exposed to hazards associated with high noise levels such as, but not limited to, hearing loss and tinnitus.

Instance A

On March 19, 2024, an employee, line lead in conversion, was exposed to noise at 109.1% of the permissible daily dose, or an average sound level of 91.2 decibels, as measured over 447 minutes of sampling. This dose is equivalent to an 8-hour TWA exposure of 90.6 decibels accounting for the period of 33 minutes unmonitored.

Instance B

On March 19, 2024, an employee, lead on cut floor, was exposed to noise at 115.4% of the permissible daily dose, or an average sound level of 92.9 decibels, as measured over 369 minutes of sampling. This dose is equivalent to an 8-hour TWA exposure of 91.0 decibels accounting for the period of 111 minutes unmonitored.

Instance C

On March 19, 2024, an employee, lead on kill floor, was exposed to noise at 156.5% of the permissible daily dose, or an average sound level of 94.0 decibels, as measured over 432 minutes of sampling. This dose is equivalent to an 8-hour TWA exposure of 92.4 decibels accounting for the period of 48 minutes unmonitored.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

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

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

Inspection Number: 1719541
Inspection Date(s): 01/04/2024 -
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 11, 2024
\$12,676.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.95(g)(1): The employer did not establish and maintain an audiometric testing program as provided by 29 CFR 1910.95(g) by making audiometric testing available to all employees whose exposures equal or exceed an 8-hour time-weighted average of 85 decibels:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer did not establish an audiometric testing program for employees who were exposed to noise levels above an 8-hour time-weighted average of 85 dBA. Employees working in areas such as, but not limited to, the cut floor, kill floor, and conversion were exposed to hazards associated with high noise levels such as, but not limited to, hearing loss and tinnitus.

Instance A

On March 19, 2024, an employee, line lead in conversion, was exposed to noise at 109.1% of the permissible daily dose, or an average sound level of 91.2 decibels, as measured over 447 minutes of sampling. This dose is equivalent to an 8-hour TWA exposure of 90.6 decibels accounting for the period of 33 minutes unmonitored.

Instance B

On March 19, 2024, an employee, lead on cut floor, was exposed to noise at 115.4% of the permissible daily dose, or an average sound level of 92.9 decibels, as measured over 369 minutes of sampling. This dose is equivalent to an 8-hour TWA exposure of 91.0 decibels accounting for the period of 111 minutes unmonitored.

Instance C

On March 19, 2024, an employee, lead on kill floor, was exposed to noise at 156.5% of the permissible daily dose, or an average sound level of 94.0 decibels, as measured over 432 minutes of sampling. This dose is equivalent to an 8-hour TWA exposure of 92.4 decibels accounting for the period of 48 minutes unmonitored.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

July 11, 2024

Proposed Penalty:

\$12,676.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.95(k)(1): The employer did not institute a training program and ensure employee participation in the program:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer did not ensure a training program was instituted to ensure employees were informed of the following: (1) the effects of noise on hearing, (2) the purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care, and (3) the purpose of audiometric testing, and an explanation of the test procedures. Employees working in areas such as, but not limited to, the cut floor, kill floor, and conversion were exposed to hazards associated with high noise levels such as, but not limited to, hearing loss and tinnitus.

Instance A

On March 19, 2024, an employee, line lead in conversion, was exposed to noise at 109.1% of the permissible daily dose, or an average sound level of 91.2 decibels, as measured over 447 minutes of sampling. This dose is equivalent to an 8-hour TWA exposure of 90.6 decibels accounting for the period of 33 minutes unmonitored.

Instance B

On March 19, 2024, an employee, lead on cut floor, was exposed to noise at 115.4% of the permissible daily dose, or an average sound level of 92.9 decibels, as measured over 369 minutes of sampling. This dose is equivalent to an 8-hour TWA exposure of 91.0 decibels accounting for the period of 111 minutes unmonitored.

Instance C

On March 19, 2024, an employee, lead on kill floor, was exposed to noise at 156.5% of the permissible daily dose, or an average sound level of 94.0 decibels, as measured over 432 minutes of sampling. This dose is equivalent to an 8-hour TWA exposure of 92.4 decibels accounting for the period of 48 minutes unmonitored.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not

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

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

Inspection Number: 1719541
Inspection Date(s): 01/04/2024 -
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 11, 2024
\$12,676.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.119(d)(3)(i)(E): The employer did not have a compilation of written process safety information pertaining to the ventilation system design.

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

Instance A

On or about January 4, 2024, the employer did not ensure the process safety information included information pertaining to the equipment in the process. The information pertaining to the design of the ventilation systems installed on the west engine room was not documented, including but not limited to information pertaining to emergency shutdown controls. Employees were exposed to hazards associated with anhydrous ammonia refrigeration systems such as, but not limited to, corrosive burns, eye damage, fire, and explosion.

Instance B

On or about January 4, 2024, the employer did not ensure the process safety information included information pertaining to the equipment in the process. The information pertaining to the design of the ventilation systems installed on the east engine room was not documented, including but not limited to information pertaining to emergency shutdown controls. Employees were exposed to hazards associated with anhydrous ammonia refrigeration systems such as, but not limited to, corrosive burns, eye damage, fire, and explosion.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

July 11, 2024

Proposed Penalty:

\$16,131.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

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

29 CFR 1910.119(e)(3)(i): The process hazard analysis did not address the hazards of the process.

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer failed to address the hazards of the process in the process hazard analysis (PHA) for a release going undetected in that employees operating the ammonia refrigeration process were exposed to undetected ammonia releases without the employer having adequate controls which could result in employees being exposed to a process with uncontrolled hazards which could result in contact with fire and explosion from an uncontrolled release of anhydrous ammonia and oil from the ammonia refrigeration equipment in the machine rooms.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

July 11, 2024

Proposed Penalty:

\$16,131.00



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.119(e)(5):The employer did not assure that PHA recommendations were resolved in a timely manner:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer did not document resolutions to recommendations identified in the process hazard analysis (PHA) to assure the items were resolved in a timely manner and that the resolution was documented, develop a written schedule to complete actions as soon as possible, complete the actions as soon as possible, and communicate actions to operating/maintenance employees. Employees were exposed to hazards associated with anhydrous ammonia refrigeration systems such as, but not limited to, corrosive burns, eye damage, fire, and explosion.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

July 11, 2024

Proposed Penalty:

\$0.00



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.119(g)(1)(i):The employer did not train each employee before being involved in operating a newly assigned process in the operating procedures as specified in paragraph (f) of this section:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer did not ensure employees involved in operating a PSM covered process were provided with training in an overview of the process, operating procedures, specific safety and health hazards, emergency operations, and safe work practices. Employees performing walkaround inspections during normal operations, restarting compressors, and adjusting temperatures in the refrigeration bays were exposed to hazards associated with anhydrous ammonia refrigeration systems such as, but not limited to, corrosive burns, eye damage, fire, and explosion.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

July 11, 2024

Proposed Penalty:

\$16,131.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

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

29 CFR 1910.119(j)(2): The employer did not implement written procedures to maintain the on-going integrity of process equipment:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

Instance A

On or about January 4, 2024, the employer did not establish written procedures to maintain the on-going integrity of process equipment. Procedures were not developed for the inspection and maintenance of ammonia gas sensors. Employees were exposed to hazards associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion in the ammonia sensors in the east engine room were nonfunctioning.

Instance B

On or about January 4, 2024, the employer did not establish written procedures to maintain the on-going integrity of process equipment. Procedures were not developed for the inspection and maintenance of dual safety pressure relief valves installed on the oil separators of the screw compressors. Employees were exposed to hazards associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion, in that the pressure relief valves of compressors in the west and east engine room were beyond their tagged replace by dates.

Instance C

On or about January 4, 2024, the employer did not establish written procedures to maintain the on-going integrity of process equipment. Procedures were not developed for the inspection and maintenance emergency shutdown buttons. Employees were exposed to hazards associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion, in that the emergency shutdown buttons on the east engine room were not operational.

Instance D

On or about January 4, 2024, the employer did not establish written procedures to maintain the on-going integrity of process equipment. Procedures were not developed for the inspection and maintenance of pressure vessels and

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

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

Inspection Number: 1719541
Inspection Date(s): 01/04/2024 -
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

pipng associated with the ammonia refrigeration systems. Employees were exposed to hazards associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion, in that equipment such as but not limited to, the high stage accumulator located in the west engine room and the associated piping showed evidence of deterioration of insulation and surface pitting.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 11, 2024
\$16,131.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.119(j)(4)(i): The employer did not perform inspections and tests on process equipment:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

Instance A

On or about January 4, 2024, the employer did not perform inspections and testing on ammonia gas sensors in the east engine room. Employees were exposed to hazards associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion in the ammonia sensors in the east engine room were nonfunctioning.

Instance B

On or about January 4, 2024, the employer did not perform inspections and testing for the dual safety pressure relief valves installed on the oil separators of the screw compressors. Employees were exposed to hazards associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion, in that the pressure relief valves of compressors in the west and east engine room were beyond their tagged replace by dates.

Instance C

On or about January 4, 2024, the employer did not perform inspections and testing for emergency shutdown buttons associated with the ventilation systems of the east and west engine rooms. Employees were exposed to hazards associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion, in that the emergency shutdown buttons on the east engine room were not operational.

Instance D

On or about January 4, 2024, the employer did not perform inspections and testing of pressure vessels and piping associated with the ammonia refrigeration systems. Employees were exposed to hazards associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion, in that equipment such as but not limited to, the high stage accumulator located in the west engine room and the associated piping showed evidence of deterioration of insulation and surface pitting.

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

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

Inspection Number: 1719541
Inspection Date(s): 01/04/2024 -
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: August 02, 2024
Proposed Penalty: \$0.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.119(j)(5): The employer did not correct deficiencies in equipment that were outside acceptable limits (defined by the process safety information on paragraph (d) of this section) in a safe and timely manner when necessary means were taken to assure safe operation:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

Instance A

On or about January 4, 2024, the employer did not ensure that the emergency shut down controls for the east engine room were functional, limiting the ability for employees to control ventilation of the room in the event of a release. Employees were exposed to hazards associated with anhydrous ammonia refrigeration systems such as, but not limited to, corrosive burns, eye damage, fire, and explosion.

Instance B

On or about January 4, 2024, the employer did not ensure that ammonia detection sensors in the engine rooms were functional, limiting the ability for employees to be warned of an ammonia release. Employees were exposed to hazards associated with anhydrous ammonia refrigeration systems such as, but not limited to, corrosive burns, eye damage, fire, and explosion.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

August 02, 2024

Proposed Penalty:

\$0.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

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

29 CFR 1910.119(n): The employer did not establish an emergency plan for the entire plant in accordance with the provisions of 29 CFR 1910.38:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer did not establish and implement all elements of an emergency action plan outlining the procedures for reporting a fire or other emergency such as an ammonia leak, procedures for emergency evacuation, and procedures to account for all employees, Employees were exposed to hazards associated with emergencies such as, but not limited to, fire and explosions resulting from a release of anhydrous ammonia.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 11, 2024
\$16,131.00

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

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

Inspection Number: 1719541
Inspection Date(s): 01/04/2024 -
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.119(h)(2)(iii):The employer did not explain the applicable provisions of the emergency action plan to contract employers who work on or adjacent to a covered process:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer did not ensure contract employers were provided an explanation of applicable provisions of the company's emergency action plan. Contract employees performing repair and maintenance activities on ammonia refrigeration systems were exposed to hazards associated with emergencies associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 11, 2024
\$0.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.119(o)(1):The employer did not certify that they have evaluated compliance with the provisions of this section at least every three years:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer did not certify that they evaluated compliance with 29 CFR 1910.119 at least once every three years to verify that the procedures and practices developed under the standard are adequate and being followed. A PSM compliance audit should have been performed in 2020. Employees were exposed to hazards associated with anhydrous ammonia such as, but not limited to, corrosive burns, eye damage, fire, and explosion in that deficiencies were identified in the company's PSM program.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 11, 2024
\$16,131.00



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

Citation 2 Item 10 Type of Violation: **Serious**

29 CFR 1910.151(c): Where employees were exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body were not provided within the work area for immediate emergency use:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

Instance A

On or about March 19, 2024, the employer did not ensure employees were provided with suitable facilities for quick drenching or flushing of the eyes and body when exposed to corrosive materials. Employees working in the east engine room were exposed to hazards associated with anhydrous ammonia such as but not limited to irritation, corrosive burns, blister formation, permanent eye damage, and blindness. When actuating the emergency eyewash, the left eye cover did not open, and orange-brown discolored water came out of the shower head.

Instance B

On or about January 4, 2024, the employer did not ensure employees were provided with suitable facilities for quick drenching or flushing of the eyes and body on the outside of the west and east engine rooms when exposed to corrosive hazards associated with anhydrous ammonia, such as but not limited to irritation, corrosive burns, blister formation, permanent eye damage, and blindness.

Abatement Note:

ANSI/IIAR 9-2020 Standard for Minimum System Safety Requirements for Existing Closed Circuit Ammonia Refrigeration Systems.

7.3.7 General. Each machinery room shall have access to a minimum of two eyewash/safety shower units, one located inside the machinery room and one located outside of the machinery room, each meeting the requirements in Section 7.3.7.3. Additional eyewash/safety shower units shall be installed such that the path of travel in the machinery room is not more than 55 feet to an eyewash/shower unit.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not

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

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

Inspection Number: 1719541
Inspection Date(s): 01/04/2024 -
Issuance Date: 06/17/2024



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

July 01, 2024
\$16,131.00

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



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.1200(e)(1):Employer had not developed or implemented a written hazard communication program which a included the requirements outlined in 29 CFR 1910.1200(e)(1)(i) and (e)(1)(ii):

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

On or about January 4, 2024, the employer did not develop and implement the elements of a written hazards communication program for employees exposed to hazards chemicals such as, but not limited to, anhydrous ammonia, tetrasodium EDTA, and sodium hydroxide. Employees working near and around the ammonia refrigeration systems and engaging in sanitation operations were exposed to hazards associated with identified chemicals such as, but not limited to, severe irritation and or burns of the nose, throat, and respiratory tract, dyspnea, and severe eye damage including blindness.

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

July 01, 2024

Proposed Penalty:

\$16,131.00

A handwritten signature in blue ink that reads "Todd Jensen".

Todd Jensen
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
100 N. Summit Street
Suite 100
Toledo, OH 43604



**INVOICE /
DEBT COLLECTION NOTICE**

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870
Issuance Date: 06/17/2024

Summary of Penalties for Inspection Number: 1719541

Citation 2 Item 1, Serious	\$12,676.00
Citation 2 Item 2, Serious	\$12,676.00
Citation 2 Item 3, Serious	\$12,676.00
Citation 2 Item 4, Serious	\$16,131.00
Citation 2 Item 5a, Serious	\$16,131.00
Citation 2 Item 5b, Serious	\$0.00
Citation 2 Item 6, Serious	\$16,131.00
Citation 2 Item 7a, Serious	\$16,131.00
Citation 2 Item 7b, Serious	\$0.00
Citation 2 Item 7c, Serious	\$0.00

Citation 2 Item 8a, Serious	\$16,131.00
Citation 2 Item 8b, Serious	\$0.00
Citation 2 Item 9, Serious	\$16,131.00
Citation 2 Item 10, Serious	\$16,131.00
Citation 2 Item 11, Serious	\$16,131.00

TOTAL PROPOSED PENALTIES: \$167,076.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the [pay.gov](http://www.pay.gov) homepage, type "OSHA" in the Search field and select Search. From the **OSHA Penalty Payment Form** search result, select Continue. The direct link is: <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.

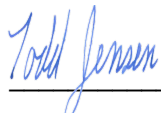
Pursuant to the Debt Collection Act of 1982 (Public Law 97-365) and regulations of the U.S. Department of Labor (29 CFR Part 20), the Occupational Safety and Health Administration is required to assess interest, delinquent charges, and administrative costs for the collection of delinquent penalty debts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

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the

recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Todd Jensen

Area Director

June 17, 2024

Date

U.S. Department of Labor Occupational Safety and Health Administration
100 N. Summit Street
Suite 100
Toledo, OH 43604



05/15/2024

HK Cooperative, Inc., dba J.H. Routh Packing Company
and its successors
4413 W. Bogart Rd.
Sandusky, OH 44870

Dear Employer:

Enclosed you will find citations for violations of the Occupational Safety and Health Act of 1970 (the Act) which may have accompanying proposed penalties. Also enclosed is a booklet entitled, "Employer Rights and Responsibilities Following an OSHA Inspection", (OSHA 3000), which explains your rights and responsibilities under the Act. If you have any questions about the enclosed citations and penalties, I would welcome further discussions in person or by telephone. Please contact me at (419) 259-7542.

You will note on page 6 of the booklet that, for violations which you do not contest, you must (1) notify this office promptly by letter that you have taken appropriate corrective action within the time set forth on the citation; and (2) pay any penalties assessed. Please inform me of the abatement steps you have taken and of their dates together with adequate supporting documentation; e.g., drawings or photographs of corrected conditions, purchase/work orders related to abatement actions, air sampling results. This information will allow us to close the case.

As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of the citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete the attached notice at the bottom of this letter and post it next to the Citations as soon as the time, date and the place of the informal conference have been determined. Be sure to bring to the conference with you any and all supporting documentation of existing conditions as well as of any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.

Sincerely,



Todd Jensen
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
100 N. Summit Street
Suite 100
Toledo, OH 43604



Citation and Notification of Penalty

To:
HK Cooperative, Inc., dba J.H. Routh Packing
Company
and its successors
4413 W. Bogart Rd.
Sandusky, OH 44870

Inspection Site:
4413 W. Bogart Rd.
Sandusky, OH 44870

Inspection Number: 1719541
Inspection Date(s): 01/04/2024 -
Issuance Date: 05/15/2024

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

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

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

Informal Conference - An informal conference is not required. However, if you wish to have such a conference you may request one with the Area Director during the 15 working day contest period by calling (419) 259-7542. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the Area Director within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference.

If you decide to request an informal conference, please complete, remove and post the Notice to Employees next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, we can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

Right to Contest – You have the right to contest this Citation and Notification of Penalty. You may contest all citation items or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. **Unless you inform the Area Director in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Occupational Safety and Health Review Commission and may not be reviewed by any court or agency.**

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the pay.gov homepage, type "OSHA" in the Search field and select Search. From **OSHA Penalty Payment Form** search result, select Continue. The direct link is:

<https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>

You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

Notification of Corrective Action – For each violation which you do not contest, you must provide **abatement certification** to the Area Director of the OSHA office issuing the citation and identified above. This abatement certification is to be provided by letter within 10 calendar days after each abatement date. Abatement certification includes the date and method of abatement. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item. The abatement certification letter must be posted at the location where the violation appeared and the corrective action took place or employees must otherwise be effectively informed about abatement activities. A sample abatement certification letter is enclosed with this Citation. In addition, where the citation indicates that **abatement documentation** is necessary, evidence of the purchase or repair of equipment, photographs or video, receipts, training records, etc., verifying that abatement has occurred is required to be provided to the Area Director.

Employer Discrimination Unlawful – The law prohibits discrimination by an employer against an employee for filing a complaint or for exercising any rights under this Act. An employee who believes that he/she has been discriminated against may file a complaint no later than 30 days after the discrimination occurred with the U.S. Department of Labor Area Office at the address shown above.

Employer Rights and Responsibilities – The enclosed booklet (OSHA 3000) outlines additional employer rights and responsibilities and should be read in conjunction with this notification.

Notice to Employees – The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the U.S. Department of Labor Area Office at the address shown above and postmarked within 15 working days (excluding weekends and Federal holidays) of the receipt by the employer of this Citation and Notification of Penalty.

Inspection Activity Data – You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to these alleged violations will be posted when our system indicates that you have received this citation. You are encouraged to review the information concerning your establishment at www.osha.gov. If you have any dispute with the accuracy of the information displayed, please contact this office.



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 05/15/2024. The conference will be held by telephone or at the OSHA office located at 100 N. Summit Street, Suite 100, Toledo, OH 43604 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1719541

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870
Issuance Date: 05/15/2024

List the specific method of correction for each item on this citation in this package that does not read "Corrected During Inspection" and return to: **U.S. Department of Labor – Occupational Safety and Health Administration, 100 N. Summit Street, Suite 100, Toledo, OH 43604.**

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

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

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

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

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

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

I certify that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement.

Signature

Date

Typed or Printed Name

Title

NOTE: 29 USC 666(g) whoever knowingly makes any false statements, representation or certification in any application, record, plan or other documents filed or required to be maintained pursuant to the Act shall, upon conviction, be punished by a fine of not more than \$10,000 or by imprisonment of not more than 6 months or both.

POSTING: A copy of completed Corrective Action Worksheet should be posted for employee review.



Citation and Notification of Penalty

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

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

29 CFR 1910.119(f)(4): The employer did not develop and implement safe work practices to provide for the control of hazards during operations such as lockout/tagout; confined space entry; opening process equipment or piping; and control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel:

HK Cooperative, Inc. DBA J.H. Routh Packing Company located at 4413 Bogart Road in Sandusky, Ohio;

Instance A

On or about December 16, 2023, the employer did not develop and implement safe working practices to provide for the control of hazards during operations performed by contractors such as, but not limited to, lockout tagout. The employer did not ensure contractors followed safe work practices by implementing lock out tag out procedures as outlined in 29 CFR 1910.147 to control the electrical, pressure, and chemical energy sources when replacing the Park RS solenoid valve coil on the Frick RXF-85-H High Stage Compressor (5A) located in the west engine room. Employees were exposed to hazards associated with liquid ammonia including, irritation to the eyes, nose, and throat, chest pain, skin burns, and frost bite.

Instance B

On or about December 16, 2023, the employer did not develop and implement safe working practices to provide for the control of hazards during operations performed by contractors such as, but not limited to, opening ammonia refrigeration piping and equipment. The employer did not ensure contractors followed line break procedure guidelines to ensure the safe entry and repair to the Park RS solenoid valve coil on the Frick RXF-85-H High Stage Compressor (5A) located in the west engine room. Employees were exposed to hazards associated with liquid ammonia including irritation to the eyes, nose, and throat; chest pain; skin burns; and frost bite.

Instance C

On or about December 16, 2023, the employer did not develop and implement safe working practices to provide for the control of hazards during operations performed by contractors such as, but not limited to, draining and off gassing ammonia-saturated oil from compressors. The employer did not ensure contractors followed safe working practices to ensure the safe repair of the Park RS solenoid valve coil on the Frick RXF-85-H High Stage Compressor (5A) located in the west engine room. Employees were exposed to hazards associated with liquid ammonia including irritation to the eyes, nose, and throat; chest pain; skin burns; and frost bite.

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

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

Inspection Number: 1719541
Inspection Date(s): 01/04/2024 -
Issuance Date: 05/15/2024



Citation and Notification of Penalty


Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870

In accordance with 29 CFR 1903.19(d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET), and in addition, documentation demonstrating that abatement is complete must be included with your certification. This documentation may include, but is not limited to, evidence of the purchase or repair of the equipment, photographic or video evidence, or written records.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

June 07, 2024
\$16,131.00



Todd Jensen
Area Director

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

U.S. Department of Labor
Occupational Safety and Health Administration
100 N. Summit Street
Suite 100
Toledo, OH 43604



**INVOICE /
DEBT COLLECTION NOTICE**

Company Name: HK Cooperative, Inc., dba J.H. Routh Packing Company
Inspection Site: 4413 W. Bogart Rd., Sandusky, OH 44870
Issuance Date: 05/15/2024

Summary of Penalties for Inspection Number: 1719541

Citation 1 Item 1, Serious \$16,131.00

TOTAL PROPOSED PENALTIES: \$16,131.00

To avoid additional charges, please remit payment promptly to this Area Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DOL-OSHA". Please indicate OSHA's Inspection Number (indicated above) on the remittance. You can also make your payment electronically at www.pay.gov. At the top of the [pay.gov](http://www.pay.gov) homepage, type "OSHA" in the Search field and select Search. From the **OSHA Penalty Payment Form** search result, select Continue. The direct link is: <https://www.pay.gov/paygov/forms/formInstance.html?agencyFormId=53090334>. You will be required to enter your inspection number when making the payment. Payments can be made by credit card or Automated Clearing House (ACH) using your banking information. Payments of \$25,000 or more require a Transaction ID, and also must be paid using ACH. If you require a Transaction ID, please contact the OSHA Debt Collection Team at (202) 693-2170.

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

If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 24 hours and will be shown on your regular account statement. You will not receive your original check back. The bank will destroy your original check, but will keep a copy of it. If the EFT cannot be completed because of insufficient funds or closed account, the bank will attempt to make the transfer up to two times.


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

Safety and Health Act.

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is one percent (1%). Interest will accrue from the date on which the penalty amounts (as proposed or adjusted) become a final order of the Occupational Safety and Health Review Commission (that is, 15 working days from your receipt of the Citation and Notification of Penalty), unless you file a notice of contest. Interest charges will be waived if the full amount owed is paid within 30 calendar days of the final order.

Delinquent Charges: A debt is considered delinquent if it has not been paid within one month (30 calendar days) of the penalty due date or if a satisfactory payment arrangement has not been made. If the debt remains delinquent for more than 90 calendar days, a delinquent charge of six percent (6%) per annum will be assessed accruing from the date that the debt became delinquent.

Administrative Costs: Agencies of the Department of Labor are required to assess additional charges for the recovery of delinquent debts. These additional charges are administrative costs incurred by the Agency in its attempt to collect an unpaid debt. Administrative costs will be assessed for demand letters sent in an attempt to collect the unpaid debt.



Todd Jensen

Area Director

May 15, 2024

Date