

**U.S. Department of Labor**  
Occupational Safety and Health Administration  
1402 Pankratz Street, Suite 114  
Madison, WI 53704



## Citation and Notification of Penalty

**To:**  
Universal Recycling Technologies, LLC  
and its successors  
2535 Beloit Ave  
Janesville, WI 53546

**Inspection Number:** 1742375  
**Inspection Date(s):** 04/18/2024 - 09/10/2024  
**Issuance Date:** 09/26/2024

**Inspection Site:**  
2535 Beloit Ave  
Janesville, WI 53546

*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 (608) 733-2822. 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](http://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 **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](http://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 09/26/2024. The conference will be held by telephone or at the OSHA office located at 1402 Pankratz Street, Suite 114, Madison, WI 53704 on \_\_\_\_\_ at

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

**CERTIFICATION OF CORRECTIVE ACTION WORKSHEET**

**Inspection Number: 1742375**

Company Name: Universal Recycling Technologies, LLC  
Inspection Site: 2535 Beloit Ave, Janesville, WI 53546  
Issuance Date: 09/26/2024

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, 1402 Pankratz Street, Suite 114, Madison, WI 53704.**

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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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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 1910.1025(d)(1)(iii): Full shift personal samples were not representative of the monitored employee's regular, daily exposure to lead:

On or about June 26, 2024, employee monitoring for lead exposure was not representative of the monitored employee's regular, daily exposure to lead, in that employees did not conduct the regular cleaning of the interior of the glass room and the Seiler room on the day of monitoring, a task that is otherwise conducted daily.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

October 25, 2024  
\$12,676.00

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

**Inspection Number:** 1742375  
**Inspection Date(s):** 04/18/2024 - 09/10/2024  
**Issuance Date:** 09/26/2024



**Citation and Notification of Penalty**

**Company Name:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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

29 CFR 1910.1027(d)(1)(ii): Determination of employee exposure was not made from breathing zone air samples that reflect the monitored employee's regular, daily 8-hour TWA exposure to cadmium:

On or about June 26, 2024, employee monitoring for lead exposure was not representative of the monitored employee's regular, daily exposure to cadmium, in that employees did not conduct the regular cleaning of the interior of the glass room and the seiler room on the day of monitoring, a task that is otherwise conducted daily.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

October 25, 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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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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 2 a Type of Violation: **Serious**

29 CFR 1910.1025(g)(2)(iv): Protective clothing against lead was not removed at the completion of the work shift in change rooms provided for that purpose as prescribed in 29 CFR 1910.1025(i)(2):

On or about April 19, 2024, the employer failed to ensure that work boots and shoes were removed in the change rooms equipped with storage facilities designated for protective work clothing and equipment. Employees removed protective work boots and shoes in the personal item locker room and stored them in personal item lockers, exposing employees to lead through the cross-contamination of work and personal clothing.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

October 18, 2024  
\$12,676.00





**Citation and Notification of Penalty**

**Company Name:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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

29 CFR 1910.1027(i)(2)(i): The employer did not ensure that employees removed all protective work clothing and equipment contaminated with cadmium in change rooms provided in accordance with 29 CFR 1910.1027(j)(1):

On or about April 19, 2024, the employer failed to ensure that work boots and shoes were removed in the change rooms equipped with storage facilities designated for protective work clothing and equipment. Employees removed protective work boots and shoes in the personal item locker room and stored them in personal item lockers, exposing employees to cadmium through the cross-contamination of work and personal clothing.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

October 18, 2024  
\$0.00

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

**Inspection Number:** 1742375  
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**Citation and Notification of Penalty**

**Company Name:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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

29 CFR 1910.1027(i)(2)(ii): The employer did not ensure that no employees took cadmium-contaminated protective clothing or equipment from the workplace:

On or about April 19, 2024, the employer failed to ensure that employees exposed to cadmium did not wear protective clothing or equipment such as work boots or shoes out of the workplace.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

October 18, 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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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 3 a Type of Violation: **Serious**

29 CFR 1910.1025(i)(3)(i): Employee(s) exposed to lead in excess of the permissible exposure limit (PEL), without regard to the use of respirators, were not required to shower at the end of the work shift:

- a) On April 19, 2024, and at times preceding and following, the employer failed to require that General Production Operators working in the Seiler TV D-Man role shower at the end of the work shift where they were exposed to lead in excess of the permissible exposure limit without regard to the use of respirators.
- b) On April 19, 2024, and at times preceding and following, the employer failed to require that General Production Operators working in the QC/Sort role shower at the end of the work shift where they were exposed to lead in excess of the permissible exposure limit without regard to the use of respirators.
- c) On June 26, 2024, and at times preceding and following, the employer failed to require that General Production Operators working in the Seiler Pit Baler role shower at the end of the work shift where they were exposed to lead in excess of the permissible exposure limit without regard to the use of respirators.
- d) On June 26, 2024, and at times preceding and following, the employer failed to require that General Production Operators working in the Seiler Pit Bagging role shower at the end of the work shift where they were exposed to lead in excess of the permissible exposure limit without regard to the use of respirators.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

October 25, 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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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

29 CFR 1910.1027(j)(3)(i): The employer did not ensure that employees exposed to cadmium above the permissible exposure limit (PEL) showered during the end of the work shift:

The employer did not ensure that employees working in the Glass Area that were exposed to cadmium above the permissible exposure limit (PEL) showered during the end of the work shift:

- a) On April 19, 2024, the employer failed to require that General Production Operators working in the Seiler TV D-Man role shower during the end of the work shift where they were exposed to cadmium in excess of the permissible exposure limit.
- b) On June 26, 2024, the employer failed to require that General Production Operators working in the Seiler TV D-Man role shower during the end of the work shift where they were exposed to cadmium in excess of the permissible exposure limit.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated: **October 25, 2024**  
Proposed Penalty: **\$0.00**



**Citation and Notification of Penalty**

**Company Name:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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

29 CFR 1910.1025(j)(2)(i)(A): The employer did not make available biological monitoring in the form of blood sampling and analysis for lead and zinc protoporphyrin levels at least every 6 months to each affected employee:

On or about April 19, 2024, the employer did not ensure employees that are regularly exposed to lead above the action level had not been provided biological monitoring for lead and zinc protoporphyrin levels at least every six months.

- a) Employees working in the Seiler DMAN position were not provided biological monitoring for lead and zinc protoporphyrin levels at least every six months.
- b) Employees working in the Seiler Baler position were not provided biological monitoring for lead and zinc protoporphyrin levels at least every six months.
- c) Employees working in the Seiler Conveyor position were not provided biological monitoring for lead and zinc protoporphyrin levels at least every six months.
- d) Employees working in the QC Sort/Sort Station position were not provided biological monitoring for lead and zinc protoporphyrin levels at least every six months.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

November 01, 2024  
\$12,676.00



**Citation and Notification of Penalty**

**Company Name:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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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 5 a Type of Violation: **Serious**

29 CFR 1910.1027(c): The employer did not ensure that no employee was exposed to an airborne concentration of cadmium in excess of five micrograms per cubic meter of air (5 µg/m<sup>3</sup>), calculated as an eight-hour time-weighted average (TWA):

Employee exposures to airborne cadmium exceeded the Permissible Exposure Limit (PEL) of five micrograms per cubic meter of air ((µg/m<sup>3</sup>) in instances such as, but not limited to:

a) On April 19, 2024, a General Processing Operator performing the TV - DMAN task at the Seiler Pit - TV D-MAN station was exposed to an 8-hour time weighted average (TWA) of 10. µg/m<sup>3</sup> for cadmium, approximately 2.0 times the Permissible Exposure Limit of 5 µg/m<sup>3</sup>. The exposure level was derived from samples taken over a 405-minute period, with zero exposure assumed for the unsampled period of 75 minutes.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

January 02, 2025  
\$12,676.00



## **Citation and Notification of Penalty**

**Company Name:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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

29 CFR 1910.1027(f)(1)(i): The employer did not implement engineering and work practice controls to reduce and maintain employee exposure to cadmium at or below the permissible exposure limit (PEL):

The employer failed to implement engineering and work practice controls to reduce and maintain employee exposure to cadmium at or below the PEL. Employee exposures to airborne cadmium exceeded the Permissible Exposure Limit (PEL) of five micrograms per cubic meter of air ( $\mu\text{g}/\text{m}^3$ ) in instances such as, but not limited to:

a) On April 19, 2024, a General Processing Operator performing the TV - DMAN task at the Seiler Pit - TV D-MAN station was exposed to an 8-hour time weighted average (TWA) of 10.  $\mu\text{g}/\text{m}^3$  for cadmium, approximately 2.0 times the Permissible Exposure Limit of 5  $\mu\text{g}/\text{m}^3$ . The exposure level was derived from samples taken over a 405-minute period, with zero exposure assumed for the unsampled period of 75 minutes.

1. Evaluate the efficacy of the ventilation provided for the Seiler Pit TV-DMAN area and workstations. Ensure that the ventilation meets or exceeds the most current recommendations outlined in the Handbook of the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE). This may include the use of localized capture ventilation in some form.
2. Research administrative controls to reduce the amount of airborne cadmium released into the work environment. This may include the use of enclosing processes or modifying work procedures.

#### Disclaimers:

1. The employer is not limited to the abatement methods suggested by OSHA;
2. The methods explained are general and may not be effective in all cases; and
3. The employer is responsible for selecting and carrying out an effective abatement method.

#### Abatement Schedule

STEP 1: Effective respiratory protection shall be provided and used by exposed employees as an interim protective measure until feasible engineering controls can be implemented or whenever such controls fail to reduce employee exposures to within permissible exposure limits.

STEP 2: A written detailed plan of abatement shall be submitted to the Area Director outlining a schedule for the

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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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implementation of engineering measures to control employee exposures to hazardous substances as referenced in this citation. This plan shall include, at a minimum, target dates for the following actions which must be consistent with abatement dates required by this citation:

1. Evaluation of engineering control options;
2. Selection of optimum control methods and completion of design;
3. Procurement, installation, and operation of selected control measures; and
4. Testing and acceptance or modification/redesign of controls.

NOTE: All proposed control measures shall be approved for each particular use by a competent industrial hygienist or other technically qualified person.

STEP 3: Abatement shall have been completed by the implementation of feasible engineering controls upon verification of their effectiveness in achieving compliance.

Date by Which Violation Must be Abated: STEP-1 UPON ISSUANCE

Date by Which Violation Must be Abated: STEP-2 30 DAYS FROM ISSUANCE

Date by Which Violation Must be Abated: STEP-3 90 DAYS FROM ISSUANCE

Date By Which Violation Must be Abated:  
Proposed Penalty:

January 02, 2025  
\$0.00



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

**Inspection Number:** 1742375  
**Inspection Date(s):** 04/18/2024 - 09/10/2024  
**Issuance Date:** 09/26/2024



**Citation and Notification of Penalty**

**Company Name:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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

29 CFR 1910.1027(e)(1): The employer did not establish a regulated area wherever an employee's exposure to airborne concentrations of cadmium was, or could reasonably have been expected to be, in excess of the permissible exposure limit (PEL):

On or about July 12, 2024, the employer failed to establish a regulated area surrounding the Seiler Pit - TV D-MAN workstation where employees had previous been, and could reasonably have been expected to be, exposed to airborne concentrations of cadmium in excess of the permissible exposure limit.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

October 18, 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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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 1 a** Type of Violation: **Repeat - Serious**

29 CFR 1910.1000(d)(1)(i): When determined by the computational formula specified in 29 CFR 1910.1000(d)(2)(i), employees were exposed to concentrations of more than one substance for which 8-hour time weighted averages are listed in Subparts Z of 29 CFR part 1910 in excess of the permissible exposure for the mixture:

The employer did not ensure that employee exposure to concentrations of more than one substance did not exceed the permissible exposure limit for the mixture of heavy metals to include inorganic Lead and Cadmium. The mixture has additive toxic effects on the kidneys.

(a) On April 19, 2024, an employee was dismantling Cathode Ray Tube Televisions at the Seiler D-Man station. The employee was exposed to inorganic Lead at an 8-hour time weighted average (TWA) of 0.067 milligrams per cubic meter (mg/m<sup>3</sup>) of air, approximately 1.3 times the permissible exposure limit (PEL) of 0.05 mg/m<sup>3</sup>; and Cadmium at an 8-hour TWA of 0.010 mg/m<sup>3</sup> of air, approximately 2.0 times the PEL of 0.005 mg/m<sup>3</sup>. The exposure concentration was approximately 3.3 times the permissible 8-hour TWA concentration for the mixture. Sampling was performed for 405 minutes. Zero exposure was assumed for the 75-minute period not sampled.

(b) On April 19, 2024, an employee was dismantling Cathode Ray Tube Televisions at the Seiler D-Man station. The employee was exposed to inorganic Lead at an 8-hour time weighted average (TWA) of 0.104 milligrams per cubic meter (mg/m<sup>3</sup>) of air, approximately 2.1 times the permissible exposure limit (PEL) of 0.05 mg/m<sup>3</sup>; and Cadmium at an 8-hour TWA of 0.0034 mg/m<sup>3</sup> of air, approximately 0.67 times the PEL of 0.005 mg/m<sup>3</sup>. The exposure concentration was approximately 2.8 times the permissible 8-hour TWA concentration for the mixture. Sampling was performed for 401 minutes. Zero exposure was assumed for the 79-minute period not sampled.

Universal Recycling Technologies, LLC was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1630595, citation number 1, item number 1 a, and was affirmed as a final order on May 1, 2023, with respect to a workplace located at 2535 Beloit Ave, Janesville, WI 53546.

In accordance with 29 CFR 1903.19(c) & (d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5), 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,

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

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**Company Name:** Universal Recycling Technologies, LLC  
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or written records.

**ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM**

Date By Which Violation Must be Abated:  
Proposed Penalty:

January 02, 2025  
\$63,382.00

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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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### Citation 2 Item 1 b Type of Violation: **Repeat - Serious**

29 CFR 1910.1000(e): Feasible administrative or engineering controls were not determined and implemented to achieve compliance with the limits prescribed in 29 CFR 1910.1000(a) through (d):

On April 19, 2024, employees working at the Seiler D-Man station were exposed in excess of the permissible exposure limit for the mixture of Lead and Cadmium and administrative or engineering controls were not implemented to decrease employee exposures below the computation formula as specified in 29 CFR 1910.1000(d)(2)(i).

(a) On April 19, 2024, an employee was dismantling Cathode Ray Tubes at the D-Man station. The employee was exposed to inorganic Lead at an 8-hour time weighted average (TWA) of 0.067 milligrams per cubic meter (mg/m<sup>3</sup>) of air, approximately 1.3 times the permissible exposure limit (PEL) of 0.05 mg/m<sup>3</sup>; and Cadmium at an 8-hour TWA of 0.010 mg/m<sup>3</sup> of air, approximately 2.0 times the PEL of 0.005 mg/m<sup>3</sup>. The exposure concentration was approximately 3.3 times the permissible 8-hour TWA concentration for the mixture. Sampling was performed for 405 minutes. Zero exposure was assumed for the 75 minute period not sampled.

(b) On April 19, 2024, an employee was dismantling Cathode Ray Tubes at the D-Man station. The employee was exposed to inorganic Lead at an 8-hour time weighted average (TWA) of 0.104 milligrams per cubic meter (mg/m<sup>3</sup>) of air, approximately 2.1 times the permissible exposure limit (PEL) of 0.05 mg/m<sup>3</sup>; and Cadmium at an 8-hour TWA of 0.0034 mg/m<sup>3</sup> of air, approximately 0.67 times the PEL of 0.005 mg/m<sup>3</sup>. The exposure concentration was approximately 2.8 times the permissible 8-hour TWA concentration for the mixture. Sampling was performed for 401 minutes. Zero exposure was assumed for the 79 minute period not sampled.

Universal Recycling Technologies, LLC was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1630595, citation number 1, item number 1 a, and was affirmed as a final order on May 1, 2023, with respect to a workplace located at 2535 Beloit Ave, Janesville, WI 53546.

1. Evaluate the efficacy of the ventilation provided for the Seiler Pit TV-DMAN area and workstations. Ensure that the ventilation meets or exceeds the most current recommendations outlined in the Handbook of the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE). This may include the use of localized capture ventilation in some form.

2. Research administrative controls to reduce the amount of airborne lead and cadmium released into the work

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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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environment. This may include the use of enclosing processes or modifying work procedures.

Disclaimers:

1. The employer is not limited to the abatement methods suggested by OSHA;
2. The methods explained are general and may not be effective in all cases; and
3. The employer is responsible for selecting and carrying out an effective abatement method.

Abatement Schedule

STEP 1: Effective respiratory protection shall be provided and used by exposed employees as an interim protective measure until feasible engineering controls can be implemented or whenever such controls fail to reduce employee exposures to within permissible exposure limits.

STEP 2: A written detailed plan of abatement shall be submitted to the Area Director outlining a schedule for the implementation of engineering measures to control employee exposures to hazardous substances as referenced in this citation. This plan shall include, at a minimum, target dates for the following actions which must be consistent with abatement dates required by this citation:

1. Evaluation of engineering control options;
2. Selection of optimum control methods and completion of design;
3. Procurement, installation, and operation of selected control measures; and
4. Testing and acceptance or modification/redesign of controls.

NOTE: All proposed control measures shall be approved for each particular use by a competent industrial hygienist or other technically qualified person.

STEP 3: Abatement shall have been completed by the implementation of feasible engineering controls upon verification of their effectiveness in achieving compliance.

Date by Which Violation Must be Abated: STEP-1      September 26, 2024

Date by Which Violation Must be Abated: STEP-2      October 28, 2024

Date by Which Violation Must be Abated: STEP-3      December 26, 2024

Date By Which Violation Must be Abated: January 02, 2025

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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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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 2 a Type of Violation: **Repeat - Serious**

29 CFR 1910.1025(h)(1): All surfaces were not maintained as free as practicable of accumulations of lead:

On or about April 18, 2024, the employer did not ensure that the surfaces inside of employee lockers used to store personal items were maintained as free as practicable of the accumulation of lead.

Universal Recycling Technologies, LLC was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1630595, citation number 1, item number 7 a and was affirmed as a final order on May 1, 2024, with respect to a workplace located at 2535 Beloit Ave, Janesville, WI 53546.

In accordance with 29 CFR 1903.19(c) & (d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5), 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:	October 10, 2024
Proposed Penalty:	\$63,382.00

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:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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Citation 2 Item 2 b Type of Violation: **Repeat - Serious**

29 CFR 1910.1027(k)(1): Surfaces were not maintained as free as practicable of accumulations of cadmium:

On or about April 18, 2024, the employer did not ensure that surfaces inside of employee lockers used to store personal items were maintained as free as practicable of the accumulation of cadmium.

Universal Recycling Technologies, LLC was previously cited for a violation of this occupational safety and health standard, which was contained in OSHA inspection number 1630595, citation number 1, item number 7 b and was affirmed as a final order on May 1, 2024, with respect to a workplace located at 2535 Beloit Ave, Janesville, WI 53546.

In accordance with 29 CFR 1903.19(c) & (d), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5), 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:	October 10, 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.

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

**Inspection Number:** 1742375  
**Inspection Date(s):** 04/18/2024 - 09/10/2024  
**Issuance Date:** 09/26/2024



**Citation and Notification of Penalty**

**Company Name:** Universal Recycling Technologies, LLC  
**Inspection Site:** 2535 Beloit Ave, Janesville, WI 53546

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

29 CFR 1910.1200(h)(3)(ii): Employee training did not include the physical and health hazards of the chemicals in the work area:

On or about April 19, 2024, General Processing Operators and Cross Functional Operations Associates working in areas in which they were exposed to both lead and cadmium had not been trained on the additive toxic effect to the kidneys resulting from exposure to the combination of lead and cadmium. Exposure to the combination of lead and cadmium can lead to the development or worsening of renal disorders at a higher rate than exposure to each of the individual contaminants as a result of this additive effect.

In accordance with 29 CFR 1903.19(c), abatement certification is required for this violation (using the CERTIFICATION OF CORRECTIVE ACTION WORKSHEET from Page 5).

Date By Which Violation Must be Abated:  
Proposed Penalty:

October 25, 2024  
\$0.00

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**Chad E. Greenwood**  
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  
1402 Pankratz Street, Suite 114  
Madison, WI 53704



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## INVOICE / DEBT COLLECTION NOTICE

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**Company Name: Universal Recycling Technologies, LLC**  
**Inspection Site: 2535 Beloit Ave, Janesville, WI 53546**  
**Issuance Date: 09/26/2024**

Summary of Penalties for Inspection Number: 1742375

Citation 1 Item 1a, Serious	\$12,676.00
Citation 1 Item 1b, Serious	\$0.00
Citation 1 Item 2a, Serious	\$12,676.00
Citation 1 Item 2b, Serious	\$0.00
Citation 1 Item 2c, Serious	\$0.00
Citation 1 Item 3a, Serious	\$12,676.00
Citation 1 Item 3b, Serious	\$0.00
Citation 1 Item 4, Serious	\$12,676.00
Citation 1 Item 5a, Serious	\$12,676.00
Citation 1 Item 5b, Serious	\$0.00
Citation 1 Item 6, Serious	\$12,676.00
Citation 2 Item 1a, Repeat - Serious	\$63,382.00
Citation 2 Item 1b, Repeat - Serious	\$0.00
Citation 2 Item 2a, Repeat - Serious	\$63,382.00
Citation 2 Item 2b, Repeat - Serious	\$0.00
Citation 3 Item 1, Other-than-Serious	\$0.00

**TOTAL PROPOSED PENALTIES: \$202,820.00**

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](http://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.

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**Chad E. Greenwood**  
Area Director

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9/26/24  
Date