

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



10/02/2024

Frazer & Jones, LLC, dba Frazer & Jones
and its successors
Sadmira Brkanovic, General Manager
PO Box 605
Syracuse, NY 13209

Dear Mr. Brkanovic:

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 (315) 451-0808.

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.

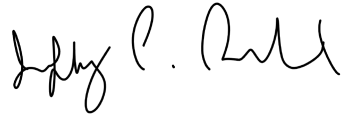
As indicated on page 3 of the booklet, you may request an informal conference with me during the 15-working-day notice of contest period. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation or the penalty.

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 black ink, appearing to read "Jeff P. Prebish". The signature is fluid and cursive, with a large initial "J" and "P".

Jeff Prebish MS CIH CSP
Area Director

Enclosures

U.S. Department of Labor

Occupational Safety and Health Administration
3300 Vickery Road
North Syracuse, NY 13212



Citation and Notification of Penalty

To:

Frazer & Jones, LLC, dba Frazer & Jones
and its successors
Sadmir Brkanovic, General Manager
PO Box 605
Syracuse, NY 13209

Inspection Site:

3000 Milton Avenue
Syracuse, NY 13209

Inspection Number: 1738547**Inspection Date(s):** 04/02/2024 - 10/02/2024**Issuance Date:** 10/02/2024

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 (315) 451-0808. During such an informal conference, you may present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies).

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

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

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

Penalty Payment – Penalties are due within 15 working days of receipt of this notification unless contested. (See the enclosed booklet and the additional information provided related to the Debt Collection Act of 1982.) Make your check or money order payable to “DOL-OSHA”. Please indicate the Inspection Number on the remittance. You can also make your payment electronically 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 **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 10/02/2024. The conference will be held by telephone or at the OSHA office located at 3300 Vickery Road, North Syracuse, NY 13212 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1738547

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209
Issuance Date: 10/02/2024

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, 3300 Vickery Road, North Syracuse, NY 13212.**

Citation Number 1 and Item Number 1 was corrected on _____
By (Method of Abatement): _____

Citation Number 1 and Item Number 3 was corrected on _____
By (Method of Abatement): _____

Citation Number 2 and Item Number 1 was corrected on _____
By (Method of Abatement): _____

Citation Number 2 and Item Number 2 was corrected on _____
By (Method of Abatement): _____

Citation Number 2 and Item Number 3 was corrected on _____
By (Method of Abatement): _____

Citation Number 2 and Item Number 4a was corrected on _____
By (Method of Abatement): _____

Citation Number 2 and Item Number 4b was corrected on _____
By (Method of Abatement): _____

Citation Number 2 and Item Number 4c was corrected on _____
By (Method of Abatement): _____

Citation Number 2 and Item Number 4d 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.

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

Inspection Number: 1738547
Inspection Date(s): 04/02/2024 - 10/02/2024
Issuance Date: 10/02/2024



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

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

29 CFR 1910.132(a): Protective equipment was not used, when necessary, whenever hazards capable of causing injury and impairment were encountered:

a) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/09/2024 the employer failed to ensure that a Foundry employee oxygen lancing the tundish nozzle, used the appropriate personal protective equipment, in that the employee did not wear protective clothing, such as, but not limited to aluminized insulated pants. The employee's pants caught on fire, causing a burn to the back leg of the employee.

Abatement certification must be submitted for this item

Date By Which Violation Must be Abated:
Proposed Penalty:

October 15, 2024
\$13,690.00

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: 1738547
Inspection Date(s): 04/02/2024 - 10/02/2024
Issuance Date: 10/02/2024



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

Citation 1 Item 2 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:

a) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/22/2024 in the 2nd floor Core Mixing Room, an employee was exposed to injurious corrosive materials including, but limited to, Envirotherm 170WF Resin, Silane W and 6500PE Warm Box Catalyst, without suitable facilities for quick drenching or flushing of the eyes and body. The portable eye wash station fill cover was removed, allowing contaminant such as phenolic sand to mix with the eye wash solution.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$9,126.00

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



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

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

29 CFR 1910.1200(f)(6): The employer did not ensure that each container of hazardous chemicals in the workplace was labeled, tagged or marked with the product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s) and name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.

- a) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/15/2024 the employer failed to ensure the Machine Shop Metal Working Fluid Dispensing system was labeled, tagged or marked with the product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s) and name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.**
- b) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/15/2024 the employer failed to ensure a spray bottle in the machine shop containing an unknown substance was labeled, tagged or marked with the product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s) and name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.**
- c) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/22/2024 the employer failed to ensure the chemical containers in the 2nd Floor Core Mixing Room were labeled, tagged or marked with the product identifier, signal word, hazard statement(s), pictogram(s), precautionary statement(s) and name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.**

Abatement certification must be submitted for this item

Date By Which Violation Must be Abated: October 15, 2024
Proposed Penalty: \$6,844.00

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



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

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

29 CFR 1910.22(a)(2): The employer did not ensure that the floor of each workroom is maintained in a clean and, to the extent feasible, in a dry condition:

- a) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/2/2024 the employer exposed employees entering or exiting the Shakeout/Hole to slip hazards from accumulated sand on the walking-working surfaces.**
- b) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/4/2024 the employer exposed employees entering or exiting the Lindberg load and unload side to slip hazards from accumulated rainwater accumulated on the walking-working surface.**
- c) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/4/2024 the employer exposed employees walking between the Maintenance Shop's Welding Area and Powered Industrial Truck Repair Area to slip hazards from accumulated rainwater accumulated on the walking-working surface.**
- d) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/9/2024 the employer exposed employees walking through the 2nd Floor Foundry Area to slip hazards from accumulated sand on the walking-working surface.**
- e) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/15/2024 the employer exposed employees working in the Machine Shop Metal Working Fluid Mixing Area to slip hazards by walking through standing liquid generated from the metal working fluid mixing process.**

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: 1738547
Inspection Date(s): 04/02/2024 - 10/02/2024
Issuance Date: 10/02/2024



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

f) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/22/2024 the employer exposed employees working between the E-Melt Deck and the DISA 1 Tundish Box to slip hazards by walking through standing water mixed with sand on the floor.

Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.22(a)(2), which was contained in OSHA inspection number 1400452, citation number 1, item number 1a and affirmed as a final order on 10/14/2021.

Abatement documentation must be submitted for this item

Date By Which Violation Must be Abated:
Proposed Penalty:

June 27, 2025
\$13,688.00

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



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

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

29 CFR 1910.157(c)(1): Portable fire extinguishers were not mounted, located and identified so that they were readily accessible without subjecting the employees to injuries:

- a) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/4/2024 a portable fire extinguisher by the Foundry Pour Deck was on the ground making it difficult to see in the workplace and was not readily accessible.**
- b) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/4/2024 a portable fire extinguisher in the Foundry Office was on the ground making it difficult to see in the workplace and was not readily accessible.**
- c) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/4/2024 a portable fire extinguisher in the Assembly & Grind Area was blocked by material and was not readily accessible.**
- d) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/15/2024 a portable fire extinguisher in the E-Melt Basement was on the ground making it difficult to see in the workplace and was not readily accessible.**
- e) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/7/2024 a portable fire extinguisher in the Maintenance Weld Shop was on the ground making it difficult to see in the workplace and was not readily accessible.**

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: 1738547
Inspection Date(s): 04/02/2024 - 10/02/2024
Issuance Date: 10/02/2024



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

f) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/20/2024 a portable fire extinguisher by DISA 1 located near the Foundry Pour Deck was on the ground making it difficult to see in the workplace and was not readily accessible.

Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.157(c)(1), which was contained in OSHA inspection number 1400452, citation number 1, item number 6a and was affirmed as a final order on 10/14/2021.

Abatement documentation must be submitted for this item

Date By Which Violation Must be Abated:	October 29, 2024
Proposed Penalty:	\$13,688.00

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



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

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

29 CFR 1910.242(b): Compressed air used for cleaning purposes was not reduced to less than 30 psi.:

- a) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/22/2024 an employee in the Core Room used compressed air, measured at approximately 46 psi., to clean the Core Machine 3.**
- b) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/23/2024 an employees in the Core Room used compressed air measured at approximately 74 psi., to cleaning the Radford Press.**

Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.242(b), which was contained in OSHA inspection number 1400452, citation number 1, item number 7 and was affirmed as a final order on 10/14/2021.

Abatement documentation must be submitted for this item

Date By Which Violation Must be Abated:	October 29, 2024
Proposed Penalty:	\$18,252.00



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

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

Citation 2 Item 4 a Type of Violation: **Repeat**

29 CFR 1910.1053(c): The employer did not ensure that no employee was exposed to an airborne concentration of respirable crystalline silica in excess of 50 ug/m³, calculated as an 8-hour TWA:

- a) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/15/2024 employees in Hard Iron were exposed to an eight-hour time weighted average (TWA) of 63.8 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.27 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 442 minutes. A zero increment is included for the 38 minutes not sampled.**
- b) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/15/2024 employees in the Sprue Table Area were exposed to an eight-hour time weighted average (TWA) of 81.9 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.64 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 446 minutes. A zero increment is included for the 34 minutes not sampled.**
- c) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/23/2024 an employee in Shakeout/Hole were exposed to an eight-hour time weighted average (TWA) of 87.18 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.74 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 479 minutes. A zero increment is included for the 1 minute not sampled.**
- d) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/23/2024 employees in the Sprue Table Area were exposed to an eight-hour time weighted average (TWA) of 89.3 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.79 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 470 minutes. A zero increment is included for the 10 minutes not sampled.**

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: 1738547
Inspection Date(s): 04/02/2024 - 10/02/2024
Issuance Date: 10/02/2024



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

e) Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 6/6/2024 an employee in the Annealing Area was exposed to an eight-hour time weighted average (TWA) of 346.59 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 6.93 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 466 minutes. A zero increment is included for the 4 minutes not sampled.

Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.1053 (c), which was contained in OSHA inspection number 1400452, citation number 1, item number 10 a) and was affirmed as a final order on 10/14/2021.

Abatement documentation must be submitted for this item

Date By Which Violation Must be Abated:	June 27, 2025
Proposed Penalty:	\$31,939.00

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



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

Citation 2 Item 4 b Type of Violation: **Repeat**

29 CFR 1910.134(g)(1)(i)(A): Tight fitting face piece respirators were worn when facial hair came between the sealing surface of the face-piece and the face:

a) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/29/2024 an employee in the Shakeout/Hole had facial hair that came between there face and the seal surface of the 3M Filtering Face Piece Respirator, Model 8511, being worn. An employee in the Shakeout/Hole was exposed to an eight-hour time weighted average (TWA) of 87.18 micrograms per cubic meter (mcg/m3) of respirable crystalline silica, approximately 1.74 times the OSHA permissible exposure limit of 50 mcg/m3. The sampling period was for 479 minutes. A zero increment is included for the 1 minute not sampled.**

Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.134(g)(1)(i)(A), which was contained in OSHA inspection number 1400452, citation number 1, item number 2c and was affirmed as a final order on 10/14/2021.

Abatement documentation must be submitted for this item

Date By Which Violation Must be Abated: October 22, 2024
Proposed Penalty: \$0.00



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

Citation 2 Item 4 c Type of Violation: Repeat

29 CFR 1910.1053(f)(1): The employer did not use engineering and work practice controls to reduce and maintain employee exposure to respirable crystalline silica to or below the PEL, unless the employer can demonstrate that such controls are not feasible:

a) **Hard Iron, Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/15/2024 the employer did not implement effective engineering and work practice controls to reduce and maintain employee exposure to respirable crystalline silica to or below the OSHA Permissible Exposure Limit. Employees in Hard Iron were exposed to an eight-hour time weighted average (TWA) of 63.8 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.27 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 442 minutes. A zero increment is included for the 38 minutes not sampled.**

b) **Sprue Table Area, Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/15/2024 the employer did not implement effective engineering and work practice controls to reduce and maintain employee exposure to respirable crystalline silica to or below the OSHA Permissible Exposure Limit. Employees in the Sprue Table Area were exposed to an eight-hour time weighted average (TWA) of 81.9 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.64 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 446 minutes. A zero increment is included for the 34 minutes not sampled.**

c) **Shakeout/Hole, Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/23/2024 the employer did not implement effective engineering and work practice controls to reduce and maintain employee exposure to respirable crystalline silica to or below the OSHA Permissible Exposure Limit. An employee in Shakeout/Hole was exposed to an eight-hour time weighted average (TWA) of 87.18 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.74 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 479 minutes. A zero increment is included for the 1 minute not sampled.**

d) **Sprue Table Area, Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/23/2024 the employer did not implement effective engineering and work practice controls to reduce and maintain employee exposure to respirable crystalline silica to or below the OSHA Permissible Exposure Limit. Employees in the Sprue Table Area were exposed to an eight-hour time weighted average (TWA) of 89.3 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.79 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 470 minutes. A zero increment is included for the 10 minutes not sampled.**

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



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

e) Annealing Area, Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 6/6/2024 the employer did not implement effective engineering and work practice controls to reduce and maintain employee exposure to respirable crystalline silica to or below the OSHA Permissible Exposure Limit. An employee in the Annealing Area was exposed to an eight-hour time weighted average (TWA) of 346.59 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 6.93 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 466 minutes. A zero increment is included for the 4 minutes not sampled.

EFFECTIVE MEANS OF ABATEMENT INCLUDE BUT ARE NOT LIMITED TO:

1. Maintaining existing controls.
2. Filtration (general and source-capture)
3. Barriers
4. Operator rotation
5. Continue to conduct air monitoring until results are below the Silica PEL

ABATEMENT WILL BE MULTI-STEP AS FOLLOWS:

Step 1: Effective respiratory protection which complies with 29 CFR 1910.134 shall be provided and used by exposed employee(s) as an interim protective measure until feasible engineering and/or administrative controls can be implemented, or whenever such controls fail to reduce employee exposure to within permissible exposure limits. (30 Days)

Step 2: Submit to the Area Director a written, detailed plan of abatement outlining a schedule for the implementation of engineering and/or administrative measures to control employee exposure 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 the abatement dates required by this citation: (60 days)

- (1) Evaluation of engineering/administrative control options
- (2) Evaluation to be conducted by a qualified person such as a certified industrial hygienist and/or licensed mechanical professional engineer.
- (3) Selection of optimum control methods and completion of design
- (4) Procurement, installation and operation of selected control measures
- (5) Testing and acceptance or modification/redesign of control measures

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: 1738547
Inspection Date(s): 04/02/2024 - 10/02/2024
Issuance Date: 10/02/2024



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

Step 3: Abatement shall have been completed by the implementation of feasible engineering and/or administrative controls upon verification of their effectiveness in achieving compliance. (180 Days)

Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.1053(f)(1), which was contained in OSHA inspection number 1400452, citation number 1, item number 10 c) and was affirmed as a final order on 10/14/2021.

Abatement documentation must be submitted for this item

Date By Which Violation Must be Abated: June 27, 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: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

Citation 2 Item 4 d Type of Violation: **Repeat**

29 CFR 1910.1053(g)(1)(iv): Respiratory protection was not worn during periods when an employee was in a regulated area:

- a) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 4/2/2024 an employee in Hard Iron, a regulated area, was not wearing respiratory protection. The employee's nose was not covered by the 3M Filtering Face Piece Respirator, Model 8511. Employees in Hard Iron were exposed to an eight-hour time weighted average (TWA) of 63.8 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.27 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 442 minutes. A zero increment is included for the 38 minutes not sampled.**
- b) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 5/23/2024 an employee in Sprue Table Area, a regulated area, was not wearing respiratory protection. The employee's nose was not covered by the 3M Filtering Face Piece Respirator, Model 8511. Employees in the Sprue Table Area were exposed to an eight-hour time weighted average (TWA) of 89.3 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.78 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 470 minutes. A zero increment is included for the 10 minutes not sampled.**
- c) **Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209. On or about 6/5/2024 an employee in Hard Iron, a regulated area, was not wearing respiratory protection. The employee was wearing a cloth face covering. Employees in Hard Iron were exposed to an eight-hour time weighted average (TWA) of 63.8 micrograms per cubic meter (mcg/m³) of respirable crystalline silica, approximately 1.27 times the OSHA permissible exposure limit of 50 mcg/m³. The sampling period was for 442 minutes. A zero increment is included for the 38 minutes not sampled.**

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: 1738547
Inspection Date(s): 04/02/2024 - 10/02/2024
Issuance Date: 10/02/2024



Citation and Notification of Penalty

Company Name: Frazer & Jones, LLC, dba Frazer & Jones
Inspection Site: 3000 Milton Avenue, Syracuse, NY 13209

Frazer & Jones, LLC, 3000 Milton Avenue, Solvay, New York, 13209, was previously cited for a violation of this occupational safety and health standard or its equivalent standard 29 CFR 1910.1053(g)(1)(iv), which was contained in OSHA inspection number 1400452, citation number 1, item number 2 d) and was affirmed as a final order on 10/14/2021.

Abatement documentation must be submitted for this item

Date By Which Violation Must be Abated: October 15, 2024
Proposed Penalty: \$0.00

A handwritten signature in black ink, appearing to read "Jeff P. Prebish".

Jeff Prebish MS CIH CSP
Area Director

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

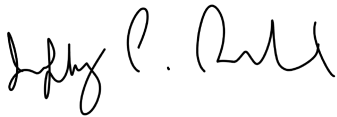
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 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.



Jeff Prebish MS CIH CSP
Area Director

October 2, 2024

Date