

U.S. Department of Labor
Occupational Safety and Health Administration
1310 W. Clairemont Avenue
Eau Claire, WI 54701
Phone: 715-832-9019 Fax: 715-832-1147



Citation and Notification of Penalty

To:
R. Stresau Laboratory, Inc.
and its successors
N8265 Medley Road
Spooner, WI 54801

Inspection Number: 1136633
Inspection Date(s): 03/31/2016 - 04/05/2016
Issuance Date: 09/23/2016

Inspection Site:
N8265 Medley Road
Spooner, WI 54801

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. 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 on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type “OSHA” and click Go. From the results, click on **OSHA Penalty Payment Form**. 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 09/23/2016. The conference will be held by telephone or at the OSHA office located at 1310 W. Clairemont Avenue, Eau Claire, WI 54701 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 1136633

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801
Issuance Date: 09/23/2016

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, 1310 W. Clairemont Avenue, Eau Claire, WI 54701**

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

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

Inspection Number: 1136633
Inspection Date(s): 03/31/2016 - 04/05/2016
Issuance Date: 09/23/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.134(d)(1)(iii): The employer did not identify and evaluate the respiratory hazard(s) in the workplace; including a reasonable estimate of employee exposures to respiratory hazards and identification of the contaminant's chemical state and physical form:

- (a) Throughout building # 4; The employer did not identify and evaluate the respiratory hazards associated with RDX, including a reasonable estimate of employee exposure while manufacturing energetic devices.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

11/15/2016
\$7482.00

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: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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(e)(3)(ii): The written compliance program for lead did not include the required sections listed in (A, B, C, E, & F) of the standard:

- (a) Throughout the facility; Employees were exposed to lead above the OSHA permissible exposure limit; the employer had an inadequate lead compliance program which did not implement the above required sections to address the reduction of lead exposure for employees that manufactured energetic devices.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/15/2016
Proposed Penalty:	\$6236.00

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

Inspection Number: 1136633
Inspection Date(s): 03/31/2016 - 04/05/2016
Issuance Date: 09/23/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(e)(3)(iv): Written compliance programs for lead were not revised and updated annually to reflect the current status of the program:

- (a) Throughout the facility; The provided written compliance program for lead had not been updated since April 16, 2008.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/15/2016

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: 1136633
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Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(e)(4)(i): When ventilation was used to control exposure to lead, measurements which demonstrate the effectiveness of the system in controlling exposure were not made at least every three months:

- (a) Throughout buildings # 4, 5, 7; The employer did not provide documentation to show that the effectiveness of the ventilation systems used to control lead exposures were checked at least every three months.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

11/15/2016
\$6236.00

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: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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 4 a Type of Violation: **Serious**

29 CFR 1910.134(f)(2): Employee(s) using tight-fitting facepiece respirators were not fit tested prior to initial use of the respirator:

- (a) On or about March 30, 2016, building # 17; Employees utilizing filtering facepiece respirators for protection against hazardous chemicals, including but not limited to, lead monoxide, were not fit tested prior to initial use.
- (b) Throughout the facility; Employees utilizing filtering facepiece respirators for protection against hazardous chemicals, including but not limited to, lead azide and lead styphnate, were not fit tested prior to initial use.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/15/2016
Proposed Penalty:	\$7482.00

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

Inspection Number: 1136633
Inspection Date(s): 03/31/2016 - 04/05/2016
Issuance Date: 09/23/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(f)(1)(i): Respirators required for protection against lead were not used during the time period necessary to install and implement engineering or work practice controls:

- (a) Prior to March 24, 2016, building # 17; Respirators required for protection against lead monoxide were not utilized and mandatory, prior to installation of engineering controls.

Date By Which Violation Must be Abated:

11/15/2016

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: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(f)(2)(i): The employer did not implement a respiratory protection program in accordance with 29 CFR 1910.134(b) through (d) (except (d)(1)(iii)), and (f) through (m) for each employee required by 29 CFR 1910.1025 to use a respirator:

- (a) Throughout the facility; The employer did not ensure the elements of the respiratory protection program were being implemented for each affected employee exposed to lead. Employees were exposed to lead over the permissible exposure limit (PEL) and the action level while manufacturing energetic devices.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/15/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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 1910.138(a): The employer did not select and require employee(s) to use appropriate hand protection when employees' hands were exposed to hazards such as those from skin absorption of harmful substances:

- (a) Throughout building #4; The employer did not require employees to use appropriate hand protection when employees were using hazardous substances including, but not limited to, RDX.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/15/2016
Proposed Penalty:	\$7482.00

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: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(g)(1)(ii): Appropriate protective work clothing and equipment was not required and utilized at all times when employee(s) were exposed to lead above the permissible exposure limit (PEL), or where the possibility of skin or eye irritation exists, such as disposable shoe coverlets and gloves:

- (a) Prior to March 31, 2016, building #17; Appropriate protective work clothing and equipment including, but not limited to, disposable shoe coverlets and gloves were not required and utilized by employees exposed to lead over the permissible exposure limit while manufacturing energetic devices.
- (b) Throughout building #4; Appropriate protective work clothing and equipment including, but not limited to, disposable shoe coverlets and gloves were not required and utilized by employees exposed to lead over the permissible while manufacturing energetic devices.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/15/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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 1910.1025(i)(2)(i): Clean change rooms were not provided for employees exposed to lead in excess of the permissible exposure limit (PEL), without regard to the use of respirators:

- (a) Throughout buildings #4 & 17; Employees that manufactured energetic devices, exposed to lead in excess of the permissible exposure limit, were not provided change rooms.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/15/2016
Proposed Penalty:	\$7482.00

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: 1136633
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Issuance Date: 09/23/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

Citation 1 Item 6 b 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) Throughout buildings #4 & 17; Employees that manufactured energetic devices, exposed to lead in excess of the permissible exposure limit, were not required to shower at the end of their work shift.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/15/2016

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: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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 7 a Type of Violation: **Serious**

29 CFR 1910.1025(j)(1)(i): A medical surveillance program was not instituted for all employee(s) who were, or could be, exposed to lead above the action level for more than thirty days per year:

- (a) Throughout the facility; A medical surveillance program was not instituted for employees who were, or could have been, exposed to lead above the action level while manufacturing energetic devices.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/15/2016
Proposed Penalty:	\$7482.00

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

Inspection Number: 1136633
Inspection Date(s): 03/31/2016 - 04/05/2016
Issuance Date: 09/23/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(j)(3)(i)(B): Medical examinations and consultations for lead were not performed prior to assignment for each employee being assigned for the first time to an area in which airborne concentrations of lead are at or above the action level:

- (a) Throughout the facility; Medical examinations and consultations for lead were not performed prior to assignment for each employee exposed to lead at or above the action level while manufacturing energetic devices.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/15/2016

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: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(k)(1)(ii)(A): An employee was not removed from work having an exposure to lead at or above the action level on each occasion that a final medical determination resulted in a medical finding, determination, or opinion that the employee had a detected medical condition which places the employee at increased risk of material impairment to health from exposure to lead:

- (a) On or about March 31, 2016, building #4 & 17; The employer did not follow the doctors determination to remove employee(s) from work areas where exposure to lead was present during the manufacturing of energetic devices.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/15/2016

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

Inspection Number: 1136633
Inspection Date(s): 03/31/2016 - 04/05/2016
Issuance Date: 09/23/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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 8 a Type of Violation: **Serious**

29 CFR 1910.1025(l)(1)(i): Employee(s) working in an area where there is potential exposure to airborne lead at any level were not informed of the content of Appendices A and B of 29 CFR 1910.1025:

- (a) Throughout the facility; Employees were exposed to lead hazards while manufacturing energetic devices and were not informed of Appendices A and B of 29 CFR 1910.1025.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/15/2016
Proposed Penalty:	\$7482.00

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: 1136633
Inspection Date(s): 03/31/2016 - 04/05/2016
Issuance Date: 09/23/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(l)(1)(ii): The employer did not train each employee who is subject to exposure to lead at or above the action level, or for whom the possibility of skin or eye irritation exists, in accordance with the requirements of 29 CFR 1910.1025, specifically 1910.1025 (l)(1)(v)(A) thru (G):

- (a) Throughout the facility; Employees exposed to lead at or above the action level while manufacturing energetic devices were not trained on the requirements specified in 29 CFR 1910.1025(l)(1).

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/15/2016

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: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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: **Willful**

29 CFR 1910.1025(c)(1): Employee(s) were exposed to lead for more than eight hours during the work day in excess of the reduced permissible exposure limit:

- (a) Building #17, Mark 20 Line; The employer did not ensure that employee(s) exposure to lead did not exceed 40 micrograms per cubic meter (ug/m³) of air, as a reduced 10-hour time weighted average (TWA) for the extended work shift. This violation occurred on April 5, 2016 when an employee manufacturing energetic devices was exposed to lead at a 10-hour TWA of 100.8 ug/m³ of air, approximately 2.52 times the permissible exposure limit of 40 ug/m³. Sampling was performed for 543 minutes during one shift. Zero exposure was assumed for the 57 minute period not sampled.
- (b) Building #17, Mark 20 Line; The employer did not ensure that employee(s) exposure to lead did not exceed 40 micrograms per cubic meter (ug/m³) of air, as a reduced 10-hour time weighted average (TWA) for the extended work shift. This violation occurred on April 5, 2016 when an employee manufacturing energetic devices was exposed to lead at a 10-hour TWA of 53.6 ug/m³ of air, approximately 1.34 times the permissible exposure limit of 40 ug/m³. Sampling was performed for 543 minutes during one shift. Zero exposure was assumed for the 57 minute period not sampled.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:	11/15/2016
Proposed Penalty:	\$85512.00

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: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(d)(2): An initial determination was not made to determine if any employee may be exposed to lead at or above the action level:

- (a) Building #17, Mark 20 Line; Initial monitoring was not performed to quantify employees exposure to lead while manufacturing energetic devices. Air sampling performed on April 5, 2016 indicated four employee exposures to lead at or above the action level.
- (b) Throughout the facility; Initial monitoring was not performed to quantify employees exposure to lead while performing cleaning and maintenance activities such as, but not limited to, sweeping and changing of filters.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

11/15/2016



Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1910.1025(e)(1)(i): For any employees exposed to lead above the permissible exposure limit for more than 30 days per year the employer did not implement engineering and work practice controls (including administrative controls) to reduce and maintain employee exposure to lead:

- (a) Building #17, Mark 20 Line; The employer failed to implement an effective combination of engineering, work practice, and respiratory controls to reduce and maintain employee(s) exposures to or below 40 micrograms per cubic meter or less. An employee was overexposed to lead on April 5, 2016 (exposure to lead at a 10-hour TWA of 100.8 ug/m³ of air, approximately 2.52 times the permissible exposure limit of 40 ug/m³) while manufacturing energetic devices.
- (b) Building #17, Mark 20 Line; The employer failed to implement an effective combination of engineering, work practice, and respiratory controls to reduce and maintain employee(s) exposures to or below 40 micrograms per cubic meter or less. An employee was overexposed to lead on April 5, 2016 (exposure to lead at a 10-hour TWA of 53.6 ug/m³ of air, approximately 1.34 times the permissible exposure limit of 40 ug/m³) while manufacturing energetic devices.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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Citation and Notification of Penalty

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801

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

29 CFR 1904.4(a): The employer did not record each work-related fatality, injury or illness case that resulted in the general recording criteria on the OSHA Form 300 or equivalent:

- (a) On or about March 31, 2016; The employer did not record workplace illnesses related to lead on the OSHA Form 300 or equivalent for the calendar year 2016 in which employee(s) received days away and/or work transfer/restrictions.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

11/15/2016
\$700.00

A handwritten signature in black ink, appearing to read "Mark Hysell", written over a horizontal line.

Mark Hysell
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
1310 W. Clairemont Avenue
Eau Claire, WI 54701
Phone: 715-832-9019 Fax: 715-832-1147



INVOICE / DEBT COLLECTION NOTICE

Company Name: R. Stresau Laboratory, Inc.
Inspection Site: N8265 Medley Road, Spooner, WI 54801
Issuance Date: 09/23/2016

Summary of Penalties for Inspection Number	1136633
Citation 1, Serious	\$57,364.00
Citation 2, Willful	\$85,512.00
Citation 3, Other-than-Serious	\$700.00
TOTAL PROPOSED PENALTIES	\$143,576.00

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 on www.pay.gov. On the left side of the pay.gov homepage, you will see an option to Search Public Forms. Type "OSHA" and click Go. From the results, click on **OSHA Penalty Payment Form**. 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.

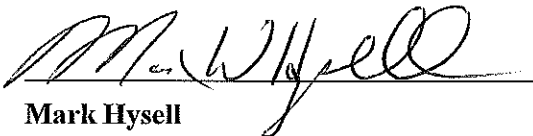
If a personal check is issued, it will be converted into an electronic fund transfer (EFT). This means that our bank will copy your check and use the account information on it to electronically debit your account for the amount of the check. The debit from your account will then usually occur within 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 2 times.

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

Interest: Interest charges will be assessed at an annual rate determined by the Secretary of the Treasury on all penalty debt amounts not paid within one month (30 calendar days) of the date on which the debt amount becomes due and payable (penalty due date). The current interest rate is 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.



Mark Hysell

Area Director

09/23/2016
Date