

U.S. Department of Labor
Occupational Safety and Health Administration
380 Westminister Street
Room 543
Providence, RI 02903
Phone: (401)528-4669 FAX: (401)528-4663

**COPY FOR YOUR
INFORMATION**



Citation and Notification of Penalty

To:
U.S. Postal Service
and its successors
24 Corliss Street
Providence, RI 02904

Inspection Number: 312343775
Inspection Date(s): 11/02/2009-04/28/2010
Issuance Date: 04/29/2010

Inspection Site:
24 Corliss Street
Providence, RI 02904

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 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. **The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.**

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904
Issuance Date: 04/29/2010

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, 380 Westminster Street, Room 543, Providence, RI 02903.

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): _____

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 affected employees and their representatives have been informed of the abatement.

NAME OF COMPANY OFFICIAL

DATE

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 for not more than six months or both.

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

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.

Corrective action, taken by you for each alleged violation should be submitted to this office on or about the abatement dates indicated on the Citation and Notification of Penalty.

If the hazards itemized on this citation(s) are not abated/corrected and a follow-up inspection is conducted, your establishment may receive a Failure to Abate Citation for the uncorrected hazards with subsequent additional monetary penalties of up to thirty (30) times the original penalty amount of the uncorrected hazards.

A work sheet has been provided to assist in providing the required abatement information. A completed copy of this work sheet should be posted at the worksite with the Citation(s).

U.S. Department of Labor
Occupational Safety and Health Administration
380 Westminister Street
Room 543
Providence, RI 02903
Phone: (401)528-4669 FAX: (401)528-4663



INVOICE/ DEBT COLLECTION NOTICE

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904
Issuance Date: 04/29/2010
Summary of Penalties for Inspection Number 312343775

Citation 1, Serious	= \$	28000.00
Citation 2, Willful	= \$	530000.00
TOTAL PROPOSED PENALTIES	= \$	558000.00

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.

OSHA does not agree to any restrictions or conditions put on any check or money order 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 4%. 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.



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

Citation 2 Item 8 Type of Violation: **Willful**

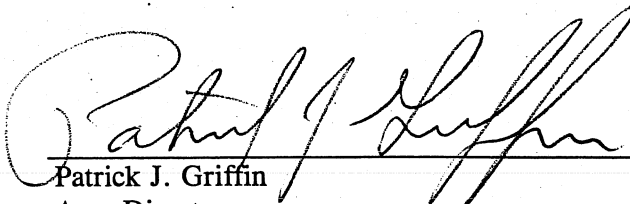
29 CFR 1910.335(b)(1): Safety signs, safety symbols, or accident prevention tags were not used where necessary to warn employees about electrical hazards which could endanger them, as required by 29 CFR 1910.145:

a) Throughout the Providence P&DC: On or about November 16, 2009, safety signs, safety symbols or accident prevention tags were not installed on the outside covers of equipment such as but not limited to Delivery Bar Code Sorter (DBCS), Automated Package Parcel Sorter (APPS), Dual Pass Rough Cuff mail processing equipment, when employees were required to examine, make adjustment or perform maintenance while the equipment is energized.

b) Throughout the Postal Facilities in Rhode Island: On or about November 04, 2009, safety signs, safety symbols or accident prevention tags were not provided on the outside covers of the premises wiring such as but not limited to, electrical power panels, switchboards, motor control center, electrical bus duct systems, heating ventilation air conditioning units, boilers, control panels, feeder and brain circuits to warn employees about electrical hazards when they were required to examine, make adjustments, service, or perform maintenance while the equipment was energized.

Abatement Note: Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that his item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 55000.00


Patrick J. Griffin
Area Director



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

Citation 2 Item 7 Type of Violation: **Willful**

29 CFR 1910.335(a)(2)(i): When working near exposed energized conductors or circuit parts, each employee did not use insulated tools or handling equipment when the tools or handling equipment might have made contact with such conductors or parts:

- a) Throughout the Providence P&DC: On or about November 06, 2009 the employer did not provide insulated tools and equipment for the Electronic Technicians and National Service Technicians who worked on and near live energized parts and conductors, such as but not limited to DBSC, APPS and flat sorter mail processing equipment performing electrical testing and maintenance.
- b) Throughout the Providence P&DC and Postal Location throughout Rhode Island: The employer did not provided insulated tools and equipment for the Building Equipment Mechanics and Field Operations Mechanics who worked on and near live energized conductors and equipment, such as but not limited to panel boards, fuses, Heating Ventilation and Air Conditioning units, performing electrical testing and maintenance.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 70000.00

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: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

Citation 2 Item 6c Type of Violation: **Willful**

29 CFR 1910.335(a)(1)(v): Employees exposed to the danger of injury to the eyes or face from electric arcs or flashes or from flying objects resulting from electrical explosion did not wear protective equipment for the eyes or face:

- a) Throughout the Providence P&DC: On or about November 6, 2009 Electronic Technicians (ET) and Machine Processing Mechanics (MPE) employees were working on Delivery Bar Code Sorters (DBCS) and Automated Package Parcel Sorter (APPS) mail processing equipment, exposing their head, face and neck to live electrical parts and were not provided with protective arc rated face shields.
- b) Throughout the Providence P&DC and Postal Locations Throughout Rhode Island: Building Equipment Mechanics were working on equipment, such as but not limited to HVAC system, water heaters, panel boards and other electric circuits, exposing their head, face and neck to live electrical parts and were not provided with protective rated arc flash/blast faceshields.
- c) Throughout the Providence P&DC: National Service Technicians were performing work on Delivery Bar Code Sorters (DBCS) and Automated Package Parcel Sorters (APPS), exposing their head, face and neck to live electrical parts and were not provided with a arc rated face shields.
- d) Throughout the Providence P&DC: Maintenance Mechanics were performing vacuuming of Delivery Bar Code Sorters (DBCS), exposing their head, face and neck to live electrical parts and were not provided with protective arc rated face shields.
- e) The Providence P&DC, Adjacent to the DBCS Mail Processing Equipment: On or about 11/04/09 an Electrician was installing a buss duct switch live and was not wearing an adequate rated arc rated face shield.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated:

10/20/2010



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 70000.00

Citation 2 Item 6b Type of Violation: Willful

29 CFR 1910.335(a)(1)(iv): Employees exposed to the danger of head injury from electric shock or burns due to contact with exposed energized parts did not wear nonconductive head protection:

a) Throughout the Providence P&DC: The Building Equipment Mechanics (BEM) whose job assignments include troubleshooting, testing and installation of electrical equipment such as but not limited to panel boards, circuit breakers, and ballast equipment that was energized and were not provided with nonconductive head protection when there was the exposure for shock and arc blast/flash hazards at voltages of 120, 208, 277 and 480.

b) Throughout the Providence P&DC and Postal Locations throughout Rhode Island: The Field Operation Maintenance (FOM) whose job assignments include troubleshooting, voltage testing and installation of electrical equipment, such as but not limited to, mail equipment, ballast and water heater and were not provided with nonconductive head protection when there was exposure for shock and arc blast/flash hazards at voltages of 110, 120, 208 and 440.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010

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: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

Citation 2 Item 6a Type of Violation: **Willful**

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

- a) Throughout the Providence P&DC: On or about November 06, 2009, Electronic Technicians and Machine Processing Mechanics were working on live electrical parts while performing trouble shooting and maintenance on mail processing equipment and are exposed to voltages of 120, 208, 277 and 480, and were not provided with appropriate electrical protective equipment, such as but not limited to voltage rated gloves, leather protectors, flame resistant clothing, arc rated face shield, balaclava and/or an arc rated hood.
- b) Throughout the Providence P&DC: Building Equipment Mechanics were working on live electrical parts and testing for deenergization on HVAC systems and other electrical equipment with voltages of 120, 208, 277 and 480, and were not provided with appropriate electrical protective equipment, such as but not limited to, voltage rated gloves, leather protectors, flame resistant clothing, arc rated face shield, balaclava and/or an arc rated hood.
- c) Throughout the Providence P&DC: On or about November 6, 2009, National Service Technician working on live electrical parts while performing trouble shooting and maintenance on mail processing equipment and are exposed to voltages of 120, 208, 277 and 480, and were not provided with appropriate electrical protective equipment, such as but not limited to voltage rated gloves, leather protectors, flame resistant clothing, arc rated face shield, balaclava and/or an arc rated hood.
- d) Throughout the Providence P&DC: Maintenance Mechanics were vacuuming electrical compartments of the Delivery Bar Code Sorters (DBCS) and were exposed to voltages of 110, 120, 208 and 277, and were not provided with appropriate electrical protective equipment, such as but not limited to, voltage rated gloves, leather protectors, flame resistant clothing, arc rated face shield, balaclava and/or arc rated hood.

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: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

Prior to the start of any work on exposed deenergized parts or near enough to them to expose the employee to any electrical hazard they present all requirements of 29 CFR 1910.332(b) shall be followed in the order in which they are presented in paragraph (b)(2)(i) through (b)(2)(v)(C)(2).

Abatement Note 2: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this items has been corrected.

Date By Which Violation Must be Abated:	10/20/2010
Proposed Penalty:	\$ 70000.00



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

Citation 2 Item 5 Type of Violation: **Willful**

29 CFR 1910.333(b)(2): While any employee(s) was exposed to contact with parts of fixed electric equipment or circuits which had been deenergized, the circuits energizing the parts were not locked out or tagged or both in accordance with the requirements of this paragraph. The requirements shall be followed in order which they are presented:

- a) Throughout the Providence P&DC: Maintenance Mechanics, were exposed to contact with parts of fixed electric equipment within the Delivery Bar Code Sorter's electric equipment compartments, which had been turned off to perform vacuuming but the employees had not followed all of the requirements of this paragraph in that the following requirement were not met in that control circuits were being used as the sole means for deenergizing equipment; Stored energy, such as capacitors were not discharged or verified as safe; Verification of deenergized circuits or parts were not performed as required.

- b) Throughout the Providence P&DC: Electronic Technicians, Mail Processing Mechanics, National Service Technicians and MPE's were exposed to contact with parts of fixed electric equipment within equipment, such as but not limited to, Automated Package Parcel Sorters (APPS), Carrier Sequence Bar Code Sorters (CSBCS) and Delivery Bar Code Sorters (DBCS) electric equipment compartments, which had been deenergized, when performing repairs and maintenance work but had not followed all of the requirements of this paragraph in that the following requirements were not met in that control circuits were being used as the sole means for deenergizing equipment; Stored energy, such as capacitors were not discharged or verified as safe; Verification of deenergized circuits or parts were not performed as required.

- c) Throughout the Providence P&DC and Postal Facilities in Rhode Island: Electrician, Field Operation Mechanics (FOM), and Building Maintenance Mechanics were exposed to contact with parts of fixed electric equipment such as but not limited to, premises wiring, electrical power panels, switch boards, motor control centers, electrical bus way system, feeder and branch circuits, heating ventilation and air conditioning (HVAC) units, boiler and control panels which had been deenergized, when performing repair installation and maintenance work, but had not followed all of the requirements of this paragraph in that the following requirement were not met in that control circuits were being used as the sole means for deenergizing equipment; Stored energy, such as capacitors were not discharged or verified as safe; Verification of deenergized circuits or parts were not performed as required.

ABATEMENT NOTE 1:

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: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

Date By Which Violation Must be Abated: 10/20/2010

Citation 2 Item 4c Type of Violation: **Willful**

29 CFR 1910.334(c)(1): Unqualified persons performed testing work on electric circuits or equipment:

a) Throughout The Providence P&DC and Postal Facilities Throughout Rhode Island: On or about November 6, 2009, electrical testing, such as but not limited to, two handed voltage testing, was being performed by unqualified employees such as, Electronic Technicians (ET), Building Equipment Maintenance (BEM), National Service Technicians, Field Operations Mechanics (FOM), Mail Process Equipment Mechanics (MPE) and Electricians in that this work was being done bare handed on live electric circuits and equipment.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

29 CFR 1910.333(a)(2): Where exposed live parts were not deenergized, other safety related work practices were not used to protect employees who could be exposed to the electrical hazards involved:

- a) Throughout the Providence P&DC: On or about November 6, 2009, the Electronic Technicians (ET) and Machine Processing Equipment Mechanics (MPE) perform electrical troubleshooting, maintenance and repair on equipment such as but not limited to Delivery Bar Code Sorter (DBCS), Automated Package Parcel Sorter (APPS) and Carrier Sequence Bar Code Sorter (CSBCS), and other safety related work practices were not used to protect them from the exposure to the electric shock and arc/blast hazards when exposed to 120, 208, and 277 volts.
- b) Throughout the Providence P&DC: Building Equipment Mechanics perform electrical troubleshooting, maintenance and repair on equipment greater than 50 volts up to and including 480 volts when performing work such as but not limited to , Main control cabinets, changing fuses, Heating Air Conditioning and Ventilation Equipment and other safety related work practices were not used to protect them from the hazard to electric shock and arc/blast.
- c) Throughout the Providence P&DC: On or about November 6, 2009, National Service Technicians perform electrical troubleshooting, maintenance and repairs on equipment such as but not limited to Delivery Bar Code Sorter (DBCS). Automated Package Parcel Sorter (APPPS) and Carrier Sequence Bar Code Sorter (CSBCS), and other safety related work practices were not used to the employee with exposure to electric shock and arc/blast hazards when exposed to 120, 208, 277 and 480 volts.
- d) Providence P&DC, Delivery Bar Code Sorter, West Side of Original Building: On or about November, 4, 2009, an electrician was installing a power feed from the energized bus duct switch to the DBCS machine while the bus duct switch and bus duct system were energized at 120/208 volts, 75 amp, and other safety related work practices were not used such as but not limited to a rated face shield and adequate gloves.
- e) Throughout the Providence P&DC and Postal Facilities throughout Rhode Island: the Field Operation Mechanics perform electrical troubleshooting on electrical equipment greater than 50 volts and safety related work practices were not used to protect them from form exposure to the hazard of electric shock and arc blast.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19; in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

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: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

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

29 CFR 1910.333(a)(1): Live parts to which an employee could be exposed were not deenergized before the employee worked on or near them:

a) Providence P&DC: Maintenance Mechanics were vacuuming inside the Delivery Bar Code Sorters (DBCS), in the electrical compartments with exposed energized electrical equipment and did so without first deenergizing the circuit on which they were working in that they did not verify absence of voltage or have a qualified person verify absence of voltage.

b) Providence P&DC, Delivery Bar Code Sorter, West Side of the original Building: On or about November 4, 2009, the electrician, while in an uninsulated Lift-a-Loft, was installing a 120/208 volts, 75 amp power feed from the energized bus duct switch to the Delivery Bar code Sorter while the bus duct switch and bus way system were energized without first deenergizing the circuit.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

29 CFR 1910.332(c): The degree of training provided was not determined by the risk to the employee:

a) Throughout the Providence P&DC and Postal Locations Throughout Rhode Island: On or about November 4, 2009, the employer had not determined the degree of training necessary for employee safety based on the risk of their exposure to recognized electrical hazards when performing their job assignments. Affected employees include but are not limited to Electronic Technicians, Building Equipment Maintenance Mechanics, Field Maintenance Operations Mechanics, Supervisors of Maintenance Operations, Maintenance engineering Specialists, and Maintenance Managers.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 70000.00



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that these items have been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 70000.00

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

29 CFR 1910.332(b)(2): Employees who are covered by paragraph (a) of this section but who are not qualified persons were not trained in and familiar with any electrically related safety practices not specifically addressed by 29 CFR 1910.331 through 29 CFR 1910.335 but which are necessary for their safety:

- a) Throughout the Providence P&DC: Maintenance Mechanics were not qualified persons and were performing vacuuming of the compartments of equipment such as but not limited to Delivery Bar Code Sorter (DBCS), exposing them to exposed live parts and were not trained nor familiar with any electrical related-safety work practices addressed by 29 CFR 1910.331 through 29 CFR 1910.335.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

Citation 2 Item 2a Type of Violation: **Willful**

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

- a) Throughout the Providence P&DC: On or about November 6, 2009, when opening covers on equipment such as but not limited to, Delivery Bar Code Sorter (DBCS), the Automated Package Parcel Sorter (APPS), and Carrier Sequence Bar Code Sorter (CSBCS) the Electronic Technicians were exposed to live electrical parts 110 volts up to and including 480 volts and were not trained and familiar with safety-related work practices.
- b) Throughout the Providence P & DC and Postal Facilities Throughout Rhode Island: Building Equipment Mechanics (BEM), and Field Operations Maintenance Mechanics were not trained and familiar with safety related work practices when performing troubleshooting maintenance, installation and repair on equipment 110 volts up to and including 480 volts.
- c) Throughout the Providence P&DC: On or about November 6, 2009, when opening covers on equipment such as but not limited to, the Automated Package Parcel Sorter (APPS), Carrier Sequence Bar Code Sorter (CSBCS), and Delivery Bar code Sorter (DBCS) National Service Technicians were exposed to live electrical parts 110 volts up to and including 480 volts and were not trained and familiar with safety-related work practices.
- d) Throughout the Providence P&DC and Postal Locations Throughout Rhode Island: On or about November 4, 2009, the two electricians were not adequately trained and familiar with safety-related work practices, in that, they did not understand what is considered live work and had not demonstrated the skills and knowledge required by the standard. They were performing work such as, but not limited to, installing a bus duct switch and installing the main feed for a Delivery Bar Code Sorter (DBSC) which exposed them to 110 volts up to and including 480 volts.

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: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

29 CFR 1910.147(c)(6)(i) (A): The periodic inspection of the energy control procedure was not performed by an authorized employee other than the one utilizing the energy control procedure being inspected:

- a) Throughout the Providence P&DC: The Supervisors Maintenance Operations (SMO), were conducting the periodic inspections (observations) of the employees performing energy control procedures and were not authorized employees, as they were not adequately trained and had never performed energy control procedures themselves.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 55000.00



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

29 CFR 1910.147(f)(3)(ii)(D): A personal lockout or tagout device(s) was not affixed to the group lockout device, group lockbox or comparable mechanism when an authorized employee began work on the machine or equipment serviced and or maintained:

- a) Deliver Bar Code Sorter, West Side of Original Building: A personal lockout and tagout device was not affixed to the group lockout device when the National Service Technician began work on the Delivery Bar Code Sorter (DBSC).

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010

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

29 CFR 1910.147(e)(3)(ii): The lockout or tagout devices removal procedures did not document all reasonable efforts to contact the authorized employee to inform him/her that his/her lockout or tagout device has been removed:

- a) Throughout the Establishment: The employer did not take all reasonable steps to contact the authorized employee and did not document the steps taken prior to cutting off an authorized employee lock.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 7000.00



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

29 CFR 1910.147(f)(3)(ii)(C): When more than one crew, craft, department, etc. was involved, in servicing and/or maintenance, the employer failed to assign overall job responsibility for coordinating affected workforces and ensuring continuity of protection (overall group lockout or tagout device control) to a designated authorized employee:

a) Delivery Bar Code Sorter, West Side of the Original Building: The employer failed to assign overall job responsibility for coordinating the authorized employees working on the installation of the Delivery Bar Code Sorter when more than one craft was under a group lockout device, allowing a National Service Technician to join the crafts without placing a lock onto the device and to begin work without checking.

ABATEMENT NOTE ONE:

Assign an employee overall responsibility prior to the start of work. Have all U.S. Postal employees going to another facility check in with the responsible employee who should assure that they have a lock and tag to put on the group lockout prior to beginning work.

ABATEMENT NOTE TWO: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated:

10/20/2010



Citation and Notification of Penalty

Company Name: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

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

29 CFR 1910.147(c)(7)(iii) (B): Additional retraining was not provided whenever a periodic inspection under 29 CFR 1910.147(c)(6) revealed that there were deviations from or inadequacies in the employee's knowledge or use of the energy control procedures:

- a) Delivery Bar Code Sorter, West Side Of Original Building: The employer failed to provide lockout/tagout retraining for the National Service Technician employee working at the Providence P&DC from Norman, OK. This employee was performing installation work on the Delivery Bar Code Sorter (DBCS) equipment and did not apply a lock and tag onto the group lockout device prior to beginning his work and was not retrained when this was observed by management.

ABATEMENT NOTE ONE:

Employee retraining shall be provided to ensure that the purpose and function of the energy control program are understood by employees and that the knowledge and skills required for the safe application, usage, and removal of the energy controls are acquired by employees. The training shall include the following:

- a) Each authorized employee shall receive retraining in the recognition of applicable hazardous energy sources, the type and magnitude of the energy available in the workplace, and the methods and means necessary for energy isolation and control when working under a group lockout device and working with the coordinator of that lockout device.

ABATEMENT NOTE TWO: Abatement Documentation is required per 29 CFR 1903.19, in form of written (i.e. policies, procedures photos and/or invoices) or other evidence this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 7000.00

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: U.S. Postal Service
Inspection Site: 24 Corliss Street, Providence, RI 02904

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

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

- a) Through out the Providence P&DC and Postal Location Throughout Rhode Island: Procedures were not developed, documented and utilized for all equipment, such as but not limited to, heating air conditioning and ventilation units, boiler room, water heaters and relocated mail processing equipment, when employees were engaged in activities, such as but not limited to, maintenance and servicing of this equipment.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 7000.00

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

29 CFR 1910.147(c)(4)(ii): The energy control procedures did not clearly and specifically outline the scope, purpose, authorization, rules, and techniques to be utilized for the control of hazardous energy, including, but not limited to items (a) through (d) of this section:

- a) Establishment: The energy control procedures' lists of authorized employees were not adequate in that each list did not list all current authorized employees who utilize the procedures to perform maintenance and servicing of equipment.

Abatement Note: Abatement Documentation is required per 29 CFR 1903.19, in the form of written (i.e. policies, procedures, photos and/or invoices) or other evidence that this item has been corrected.

Date By Which Violation Must be Abated: 10/20/2010
Proposed Penalty: \$ 7000.00

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



NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 04/29/2010. The conference will be held at the OSHA office located at 380 Westminster Street, Room 543, Providence, RI, 02903 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

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

Internet Information - 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 your inspection will be available 7 calendar days after the Citation Issuance Date. 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 - 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.

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 page 4 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.

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

Notification of Corrective Action - For each violations which you do not contest, you are required by 29 CFR 1903.19 to submit an Abatement Certification to the Area Director of the OSHA office issuing the citation and identified above. The certification must be sent by you within 10 calendar days of the abatement date indicated on the citation. For **Willful** and **Repeat** violations, documents (examples: photos, copies of receipts, training records, etc.) demonstrating that abatement is complete must accompany the certification. Where the citation is classified as **Serious** and the citations states that abatement documentation is required, documents such as those described above are required to be submitted along with the abatement certificate. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item.

All abatement verification documents must contain the following information: 1) Your name and address; 2) the inspection number (found on the front page); 3) the citation and citation item number(s) to which the submission relates; 4) a statement that the information is accurate; 5) the signature of the employer or employer's authorized representative; 6) the date the hazard was corrected; 7) a brief statement of how the hazard was corrected; and 8) a statement that affected employees and their representatives have been informed of the abatement.

The law also requires a copy of all abatement verification documents, required by 29 CFR 1903.19 to be sent to OSHA, also be posted at the location where the violation appeared and the corrective action took place.

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.