

U.S. Department of Labor

Occupational Safety and Health Administration
200 N. High Street
Room 620
Columbus, OH 43215
Phone: 614-469-5582 Fax: 614-469-6791



Citation and Notification of Penalty

To:

Georgia-Pacific Chemicals, LLC
and its successors
1975 Watkins Road
Columbus, OH 43207

Inspection Number: 985164**Inspection Date(s):** 07/16/2014 - 01/06/2015**Issuance Date:** 01/14/2015**Inspection Site:**

1975 Watkins Road
Columbus, OH 43207

7012 2210 0001 1866 6276

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 \$50,000 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 01/14/2015. The conference will be held by telephone or at the OSHA office located at 200 N. High Street, Room 620, Columbus, OH 43215 on _____ at _____.

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

CERTIFICATION OF CORRECTIVE ACTION WORKSHEET

Inspection Number: 985164

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207
Issuance Date: 01/14/2015

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, 200 N. High Street, Room 620, Columbus, OH 43215**

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: 985164
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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(d)(2)(i)(C): Information concerning the technology of the process shall include at least the following: Maximum intended inventory:

- a. The employer's process safety information (PSI) did not include an accurate maximum intended inventory for the formaldehyde process including formaldehyde plant 1 and plant 2.
- b. The employer's process safety information (PSI) did not include an accurate maximum intended inventory for the resin process including the K1 kettle and K3 kettle.

Date By Which Violation Must be Abated:
Proposed Penalty:

Corrected During Inspection
\$5500.00

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: 985164
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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(d)(2)(i)(D): Information concerning the technology of the process shall include at least the following: Safe upper and lower limits for such items as temperatures, pressures, flows or compositions:

a. The employer's process safety information (PSI) did not include the safe upper and lower limits for formaldehyde plant 2 which included, but was not limited to, the following: converter temperature, converter exit gas temperature, converter pressure, heat transfer fluid (HTF) flow, methanol flow, methanol volume percent, oxygen concentration, HTF condenser water level, blower oil temperature, blower exit air temperature, blower exit air pressure, blower oil pressure, HTF pressure, absorber levels, and formaldehyde storage tank levels.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/19/2015
\$5500.00

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

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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

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

29 CFR 1910.119(d)(3)(i)(H): Information pertaining to the equipment in the process shall include: Safety systems (e.g. interlocks, detection or suppression systems):

a. The employer's process safety information (PSI) was not complete and did not include accurate information on the safety interlocks for formaldehyde plant 2.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/19/2015
\$5500.00

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

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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(f)(1)(iv): The employer shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements: Safety systems and their functions:

- a. The employer's Formaldehyde Plant 2 Standard Operating Procedures (Revision #3) did not include accurate information on the plant safety interlocks, and safety system process controls and operating conditions for formaldehyde plant 2.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

02/19/2015

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

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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(e)(3)(iii): The process hazard analysis shall address: Engineering and administrative controls applicable to the hazards and their interrelationships such as appropriate application of detection methodologies to provide early warning of releases. (Acceptable detection methods might include process monitoring and control instrumentation with alarms, and detection hardware such as hydrocarbon sensors.):

a. The employer's 2010 revalidation PHA for the No. 2 Formaldehyde Plant did not address all engineering controls applicable to the hazards identified in the process hazard analysis such as, but not limited to, the following safeguards: high oxygen concentration alarm, low oxygen concentration alarm, high-high oxygen concentration interlock, high-high-high oxygen concentration interlock, low-low oxygen concentration interlock, high methanol volume percent alarm, high-high methanol volume percent interlock, high vaporizer outlet temperature alarm, low vaporizer outlet temperature alarm, low-low vaporizer outlet temperature interlock, high converter catalyst bed temperature alarm, high-high converter tube hot spot temperature/high average tube hot spot temperature interlock, two high-high converter tube hot spot temperature interlock, high-high converter hot spot temperature/temperature rate of rise interlock, high converter exit gas temperature alarm, high-high converter exit gas temperature interlock, high-high-high converter exit gas temperature interlock, high converter pressure alarm, low converter pressure alarm, high-high converter pressure interlock, low-low converter pressure interlock, low HTF flow rate to converter alarm, low-low HTF flow rate to converter interlock, high HTF condenser steam pressure alarm, low HTF condenser steam pressure alarm, high HTF system pressure alarm, low HTF system pressure alarm, high-high HTF system pressure interlock, high HTF condenser boiler feed water level alarm, low HTF condenser boiler feed water level alarm, low-low HTF condenser boiler feed water level interlock, primary blower failure interlock, secondary blower failure interlock, high/low methanol flow alarms, and low methanol flow interlock.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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

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Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(e)(3)(iv): The process hazard analysis (PHA) shall address: Consequences of failure of engineering and administrative controls:

a. The employer's 2010 revalidation PHA for the No. 2 Formaldehyde Plant did not address the consequences of failure of the plant rate reduction interlock for the secondary blower #4 to reduce methanol flow to 7.0 gallons per minute.

b. The employer's 2010 revalidation PHA for the No. 2 Formaldehyde Plant did not address the consequences of failure of engineering controls such as, but not limited to, the following safeguards: high oxygen concentration alarm, low oxygen concentration alarm, high-high oxygen concentration interlock, high-high-high oxygen concentration interlock, low-low oxygen concentration interlock, high methanol volume percent alarm, high-high methanol volume percent interlock, high vaporizer outlet temperature alarm, low vaporizer outlet temperature alarm, low-low vaporizer outlet temperature interlock, high converter catalyst bed temperature alarm, high-high converter tube hot spot temperature/high average tube hot spot temperature interlock, two high-high converter tube hot spot temperature interlock, high-high converter hot spot temperature/temperature rate of rise interlock, high converter exit gas temperature alarm, high-high converter exit gas temperature interlock, high-high-high converter exit gas temperature interlock, high converter pressure alarm, low converter pressure alarm, high-high converter pressure interlock, low-low converter pressure interlock, low HTF flow rate to converter alarm, low-low HTF flow rate to converter interlock, high HTF condenser steam pressure alarm, low HTF condenser steam pressure alarm, high HTF system pressure alarm, low HTF system pressure alarm, high-high HTF system pressure interlock, high HTF condenser boiler feed water level alarm, low HTF condenser boiler feed water level alarm, low-low HTF condenser boiler feed water level interlock, primary blower failure interlock, secondary blower failure interlock, high/low methanol flow alarms, and low methanol flow interlock.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
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02/19/2015
\$5500.00

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

Inspection Number: 985164
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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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 1910.119(e)(5): The employer shall establish a system to promptly address the team's findings and recommendations; assure that the recommendations are resolved in a timely manner and that the resolution is documented; document what actions are to be taken; complete actions as soon as possible; develop a written schedule of when these actions are to be completed; communicate the actions to operating, maintenance and other employees whose work assignments are in the process and who may be affected by the recommendations or actions:

- a. The employer did not document the resolutions and develop a written schedule of when the 177 actions were to be completed for the 1999 revalidation PHA of No. 2 Formaldehyde Unit.
- b. The employer did not document the resolutions with completion dates and develop a written schedule with target dates as to when the 18 action items were to be completed for the 1996 initial PHA for Formaldehyde Plant #2.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/19/2015
\$5500.00

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

Inspection Number: 985164
Inspection Date(s): 07/16/2014 - 01/06/2015
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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(e)(7): Employers shall retain process hazards analyses and updates or revalidations for each process covered by this section, as well as the documented resolution of recommendations described in paragraph (e)(5) of this section for the life of the process:

- a. The employer did not retain the documented resolution of recommendations for the 2006 revalidation PHA for No. 2 Formaldehyde Unit.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

02/19/2015

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

Inspection Number: 985164
Inspection Date(s): 07/16/2014 - 01/06/2015
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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(f)(1)(ii)(A): The employer shall develop and implement written operating procedures that provide clear instructions for safely conducting activities involved in each covered process consistent with the process safety information and shall address at least the following elements:
Operating limits: Consequences of deviation:

a. In formaldehyde plant 2, the Formaldehyde Plant 2 Standard Operating Procedures (Revision #3) did not address consequences of deviation, including those affecting the safety and health of employees.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
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02/19/2015
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U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 985164
Inspection Date(s): 07/16/2014 - 01/06/2015
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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(j)(2): Written procedures. The employer shall establish and implement written procedures to maintain the on-going integrity of process equipment:

- a. In the formaldehyde plant 2 and resin kettle K-1/K-3 processes/units, the employer did not establish and implement written procedures to maintain the on-going integrity of piping systems including the replacement of process piping, weld repairs of process piping, use of temporary clamps on process piping, and documenting the details of the associated pipe replacement or repairs.
- b. In the formaldehyde plant 2 and resin kettle K-1/K-3 processes/units, the employer did not establish and implement written procedures to maintain the on-going integrity of piping systems including welders performance qualifications.
- c. In the formaldehyde plant 2 and resin kettle K-1/K-3 processes/units, the employer did not establish and implement written procedures to maintain the on-going integrity of piping systems including criteria for resolving anomalous inspection data related to thickness growth.
- d. In the formaldehyde plant 2 and resin kettle K-1/K-3 processes/units, the employer did not establish and implement written procedures to maintain the on-going integrity of piping systems including quality assurance criteria for inspecting and examining welds.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/19/2015
\$5500.00

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: 985164
Inspection Date(s): 07/16/2014 - 01/06/2015
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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(j)(4)(ii): Inspection and testing procedures shall follow recognized and generally accepted good engineering practices:

- a. On piping circuit #050894-04, "HCHO from Storage to Truck Loading Piping System" located in the formaldehyde plant 2 process/unit, the employer did not follow recognized and generally accepted good engineering practices (RAGAGEP) when the weld repair that was performed on or about October 4, 2013, for a leak on an existing weld was not authorized by the authorized piping inspector prior to its commencement.
- b. On piping circuit #050894-04, "HCHO from Storage to Truck Loading Piping System" located in the formaldehyde plant 2 process/unit, the employer did not follow recognized and generally accepted good engineering practices (RAGAGEP) when the weld repair that was performed on or about October 4, 2013, for a leak on an existing weld was not approved by the authorized piping inspector after the repairs had been completed.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/19/2015
\$5500.00

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

Inspection Number: 985164
Inspection Date(s): 07/16/2014 - 01/06/2015
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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(j)(4)(iii): The frequency of inspections and tests of process equipment shall be consistent with applicable manufacturers' recommendations and good engineering practices, and more frequently if determined to be necessary by prior operating experience:

a. In the formaldehyde plant 2 process/unit, the Servomex oxygen analyzer, tag number OIC-201, was not calibrated and inspected weekly according to the employer's calibration schedule during the months of September through November, 2014.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/19/2015
\$5500.00

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

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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

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

29 CFR 1910.119(l)(3): Employees involved in operating a process and maintenance and contract employees whose job tasks will be affected by a change in the process shall be informed of, and trained in, the change prior to start-up of the process or affected part of the process:

a. The employer did not ensure that operators and maintenance employees in the formaldehyde plant 2 process and other process safety management covered areas of the facility were trained in the changes prior to the start-up of the affected part of the process including, but not limited to, the following management of changes (MOC's): MOC ID 119-014, Plant #1 Shutdown Interlock Upgrade; MOC ID 074-014, SOP Revisions to Plant #1 and Plant #2 Clarify 2 Min Purge and to Assure #5 Blower Isolation Valve is Closed Anytime #5 Blower Shuts Down; MOC ID 090-014, #2 Plant Make Up Water Piping; MOC ID 091-014, #2 Plant Make Up Water Piping X2; MOC ID 099-014, Provide Glycol Cooling to Top of #2 Absorber; MOC ID 092-14, Change in Personnel Maintenance; MOC ID 066-14, Blower 3 Boot Replacement; MOC ID 155-13, 3 Soft Patches on the HCHO Kettle Charge Line; MOC ID 106-13, Run #2 and #4 Bowers Only; and MOC ID 114-013, Automate #2 Oxidizer to the DCS.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

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

Citation 2 Item 1 a Type of Violation: Other-than-Serious

29 CFR 1910.119(m)(4)(iv): A report shall be prepared at the conclusion of the investigation which includes at a minimum: The factors that contributed to the incident:

a. In formaldehyde plant 2, the incident investigation report for Incident Report ID 516831 which involved the tripping of blower 4 with no reduction of the methanol flow rate to 7.0 gallons per minute on or about April 24, 2014, and which was closed on or about July 7, 2014, did not include all of the factors that contributed to the incident.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:
Proposed Penalty:

02/19/2015
\$0.00

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Citation and Notification of Penalty

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207

Citation 2 Item 1 b Type of Violation: Other-than-Serious

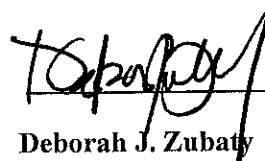
29 CFR 1910.119(m)(4)(v): A report shall be prepared at the conclusion of the investigation which includes at a minimum: Any recommendations resulting from the investigation:

a. In formaldehyde plant 2, the incident investigation report for Incident Report ID 516831 which involved the tripping of blower 4 with no reduction of the methanol flow rate to 7.0 gallons per minute on or about April 24, 2014, and which was closed on or about July 7, 2014, did not include any recommendations or corrective actions.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated:

02/19/2015


Deborah J. Zubaty
Area Director

U.S. Department of Labor
Occupational Safety and Health Administration
200 N. High Street
Room 620
Columbus, OH 43215
Phone: 614-469-5582 Fax: 614-469-6791



INVOICE / DEBT COLLECTION NOTICE

Company Name: Georgia-Pacific Chemicals, LLC
Inspection Site: 1975 Watkins Road, Columbus, OH 43207
Issuance Date: 01/14/2015

Summary of Penalties for Inspection Number	985164
Citation 1, Serious	\$60500.00
Citation 2, Other-than-Serious	\$0.00
TOTAL PROPOSED PENALTIES	\$60500.00

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 \$50,000 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.



Deborah J. Zubaty
Area Director